

# PREA Facility Audit Report: Final

**Name of Facility:** Central Florida Reception Center

**Facility Type:** Prison / Jail

**Date Interim Report Submitted:** NA

**Date Final Report Submitted:** 08/24/2018

Auditor Certification	
The contents of this report are accurate to the best of my knowledge.	<input checked="" type="checkbox"/>
No conflict of interest exists with respect to my ability to conduct an audit of the agency under review.	<input checked="" type="checkbox"/>
I have not included in the final report any personally identifiable information (PII) about any inmate/resident/detainee or staff member, except where the names of administrative personnel are specifically requested in the report template.	<input checked="" type="checkbox"/>
<b>Auditor Full Name as Signed:</b> James Curington	<b>Date of Signature:</b> 08/24/2018

AUDITOR INFORMATION	
<b>Auditor name:</b>	Curington, Jim
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<b>Start Date of On-Site Audit:</b>	07/08/2018
<b>End Date of On-Site Audit:</b>	07/12/2018

FACILITY INFORMATION	
<b>Facility name:</b>	Central Florida Reception Center
<b>Facility physical address:</b>	7000 H C Kelley Road, Orlando, Florida - 32831
<b>Facility Phone</b>	407-207-7777
<b>Facility mailing address:</b>	
<b>The facility is:</b>	<input type="radio"/> County <input type="radio"/> Federal <input type="radio"/> Municipal <input checked="" type="radio"/> State <input type="radio"/> Military <input type="radio"/> Private for profit <input type="radio"/> Private not for profit
<b>Facility Type:</b>	<input checked="" type="radio"/> Prison <input type="radio"/> Jail

Primary Contact			
<b>Name:</b>	Carol Casimir	<b>Title:</b>	Assitant Warden of Programs
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Warden/Superintendent			
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Facility PREA Compliance Manager			
<b>Name:</b>	Carol Casimir	<b>Email Address:</b>	Carol.Casimir@fdc.myflorida.com

Facility Health Service Administrator			
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Facility Characteristics		
<b>Designed facility capacity:</b>	3454	
<b>Current population of facility:</b>	2082	
<b>Age Range</b>	Adults: 18-99	Youthful Residents: 0
<b>Facility security level/inmate custody levels:</b>	Main Unit Level 6 East Unit Level 4 South Unit Level 5 FDC and Private Community Release Centers Level 1, Community, Minimum, Medium and Close Custodies	
<b>Number of staff currently employed at the facility who may have contact with inmates:</b>	675	

AGENCY INFORMATION	
<b>Name of agency:</b>	Florida Department of Corrections
<b>Governing authority or parent agency (if applicable):</b>	
<b>Physical Address:</b>	501 S Calhoun Street, Tallahassee, Florida - 32399
<b>Mailing Address:</b>	
<b>Telephone number:</b>	850-488-5021

Agency Chief Executive Officer Information:			
<b>Name:</b>	Julie Jones	<b>Title:</b>	Secretary
<b>Email Address:</b>	Julie.Jones@fdc.myflorida.com	<b>Telephone Number:</b>	850-488-5021

<b>Agency-Wide PREA Coordinator Information</b>			
<b>Name:</b>	Kendra Prisk	<b>Email Address:</b>	Kendra.Prisk@fdc.myflorida.com

## AUDIT FINDINGS

### **Narrative:**

The auditor's description of the audit methodology should include a detailed description of the following processes during the pre-audit, on-site audit, and post-audit phases: documents and files reviewed, discussions and types of interviews conducted, number of days spent on-site, observations made during the site-review, and a detailed description of any follow-up work conducted during the post-audit phase. The narrative should describe the techniques the auditor used to sample documentation and select interviewees, and the auditor's process for the site review.

The Prison Rape Elimination Act (PREA) Audit for the Florida Department of Corrections (FDC), Central Florida Reception Center (CFRC) is prepared by James Curington, lead auditor. The Audit itself was accomplished by the AJF Correctional Consulting and Auditing, audit team of James Curington and Amy Fairbanks both certified PREA Auditors trained by the PREA Resource Center (PRC), (from the second class of auditors and first-class of auditors, respectfully). Both auditors have been recertified as of 2017.

Central Florida Reception Center is a major reception facility in central Florida, with three units (a Main Unit, an East Unit and a South Unit) and with six satellite facilities reentry/community release centers in Orlando, Florida; Kissimmee, Florida; and Cocoa, Florida. These satellite facilities are 1. Orlando Bridge, 2. Bridges of Orlando, 3. Orlando CRC, 4. Kissimmee CRC, 5. Kissimmee TTH, and 6. Cocoa Bridge.

The auditors from AJF Correctional Counseling and Auditing were appointed/contracted by Mrs. Kendra Prisk, FDC, Agency PREA Coordinator. The auditors were accompanied and escorted for the on-site tours and visits to the facility units and satellites by Ms. Sheila Cumbie, Warden; Ms. Carol Casimir, Assistant Warden/PREA Compliance Manager; Ms. Kellie Eberlein, Correctional Services Consultant PREA; and other key staff, as appropriate.

The auditors' methodology was to use a step-by-step process as follows.

First, contacting and contracting with the agency/facility to accomplish the prison audit as outlined by the Prison Rape Elimination Act of 2003. Using the Online Automated System (OAS), reviewing and auditing the 43 standards of the Act, plus the two supplemental standards, and using the evaluation instruments of the PREA Resource Center (PRC) as directed by the PRC and the OAS system.

Second, sending a pre-audit report to the PRC, which was accomplished by a the use of the Online Automated System.

Third, making contacts with the facility, the posting of notices, and developing an agenda for the site visit. The agenda for the site visit was forwarded to the facility Warden, facility PREA Compliance Manager, and the Agency PREA Office Correctional Consultant.

Fourth, obtaining and reviewing the Pre-Audit Questionnaire facility information accomplished by the use of the OAS (the first leg of the triangulation process).

Fifth, making a site visit to the community and the facility (including satellite facilities).

Sixth, making an assessment of compliance/noncompliance and the triangulation of a) the preaudit review and information, b) the site visits and tours, c) post site review of materials, interviews, and documents, and an assessment of compliance/noncompliance.

Seventh, completing an interim/final report-summary report.

Eighth, notifying the agency/facility of the Auditor Summary Report and sending this Summary Report/Post Audit Report/Final Report to the PRC. The Final Report is accomplished by the triangulation method to bring together the assessment process of the pre-audit work, on-site work, and summary review assessment work.

Specific to the Florida Department of Corrections and the CFRC audit, the following materials were used to evaluate and assess CFRC's compliance with the PREA.

The PREA Auditor Handbook.

The PREA Report Template, April 2018 website copy, to assist with scripted formal interviews of the Warden, Specialized Staff, Random Staff, and Inmates and to assist with verification of standards and the subsections of the standards for compliance/noncompliance.

The PREA Audit Instrument, Adult Prisons and Jails and its various sections.

The Online Automated System as set up by the FDC through the PRC for the auditors use (accessed by the two PREA auditors assessing CFRC). Note: on this last statement, the auditors found the OAS to positively assist with the accomplishment of a thorough and comprehensive audit.

After the contacts and notifications and the establishment of the Online Automated System, auditors began their reviews of the 12 sections of the compliance tool, including the standards, and the subsections of the standards. The 12 sections addressed the following: 1) Prevention Planning, 2) Response Planning, 3) Training and Education, 4) Screening for Risk of Victimization and Abusiveness, 5) Reporting, 6) Official Response Following an Inmate Report, 7) Investigations, 8) Discipline, 9) Medical and Mental Health Care, 10) Data Collection and Review, 11) Auditing and Corrective Action, 12) Post Audit Report and Audit Findings.

Following this preaudit review, the auditors began their site visit. The second part of the triangulation. The site visit began on Sunday, July 8 and continued through Thursday, July 12, and approximated the following agenda:

Sunday, July 8

Evening dinner, introductions, meet and greet, and audit agenda/schedule discussion.

Monday, July 9

Tour the perimeter, review the facility. PREA audit discussion, including the Pre-audit Questionnaire, the Auditor Compliance Tool and the OAS, the Instructions for the PREA Audit Tour, Interviews, and review of the Auditor's Summary Report PRC Template.

Schedule interviews with staff and inmates, as outlined by the PREA Auditor Handbook for three units and six satellites. Discuss the inmate roster, including inmates with disabilities, LGBTI inmates, inmates who are limited English proficient, inmates in segregated housing, inmates, who reported sexual victimization during a screening, inmates who reported sexual abuse, and inmates placed in segregated housing for protection from sexual victimization.

Also discuss staff, volunteers, interns, and contractors interviews. Designate specialized staff (see interview protocols for staff).

Tour the Main Unit, East Unit, South Unit, and outside areas of CFRC (auditors assumed individual visits, tours, assignments and interviews to accomplish a thorough and comprehensive audit).

Afternoon, begin interviews of staff and inmates. Attend shift briefings. Review evening programs, as appropriate.

Tuesday, July 10

Morning, tour satellite facilities.

Afternoon, visit and revisit institutional operational areas. Review specialty program areas, including healthcare, and security. Review of offender orientation/admission/intake. Review documents and continue with interviews of staff and inmates.

Wednesday, July 11

Morning, tour and visit satellite facilities. Observe programs and operations at satellite facilities. Interview staff and inmates.

Afternoon, review auditor's summary template questions with Warden and key staff.

Thursday, July 12 morning, begin "triangulation" of the 1) Pre-Audit Questionnaire (PAQ) and preaudit documents, and policy review; 2) the site visits, tours and interviews; and 3) secure appropriate information, and documentation for the report. Note: 65 scripted and formal interviews were conducted of the inmate population, and 55 scripted and formal interviews were conducted with specialized (21) and random (34) staff, at satellite facilities and the Units of the CFRC. Many more informal interviews were held with staff and inmates at the Units and the satellite facilities assessing not only PREA compliance, but evaluating quality of life, conditions of confinement, communications between staff and inmates, and simply observing and assessing operations/programs/safety and security (all of which were impressive, positive, and assessed as very satisfactory by the auditors).

Through this methodology, the auditors wish to state that it was noticeable throughout CFRC and its satellites, that staff and inmates were aware of the zero tolerance policy of the agency and the institution, and that the institution was taking a lead to eliminate sexual abuse and sexual harassment in prison. The auditors attributed the very successful/exceptional custody, care and control observed by the audit team, to the diversity of the leadership, the attention to detail by the leadership, and the emphasis of professional, respectful and individualized treatment of inmates, and the insistence of following the law, policies, procedures, rules and regulations.

## AUDIT FINDINGS

### Facility Characteristics:

The auditor's description of the audited facility should include details about the facility type, demographics and size of the inmate or resident population, numbers and type of staff positions, configuration and layout of the facility, numbers of housing units, description of housing units including any special housing units, a description of programs and services, including food service and recreation. The auditor should describe how these details are relevant to PREA implementation and compliance.

The Central Florida Reception Center (CFRC) of the Florida Department of Corrections (FDC) is an adult, close custody very large facility (total count 2784 inmates) in central Florida. The facility itself is composed of three Units of three fenced compounds (the Main Unit, 1269 male inmates; the East Unit, 796 male inmates; the South Unit, 72 male inmates) at its primary address of 7000 HC Kelly Rd., Orlando, FL-32831. In addition to the primary address facility, there are six community satellite centers under the auspices and direction of the CFRC Warden, and Assistant Warden/PREA Manager (the Orlando Bridge, 131 female inmates; the Bridges of Orlando, 145 male inmates; Orlando CRC, 79 female inmates; Kissimmee CRC, 146 male inmates; Kissimmee TTH, 66 male inmates; and Cocoa Bridge, 80 male inmates). The inmates housed at the primary address facility are in fenced compounds with varying securities from minimum to maximum security and the inmates housed in the six satellite centers are all of community or minimum custody, with short sentences, working in the community, assigned to the community projects, or soon to be re-entering community and society. Additional demographics for the inmate population include an age range of 18 to 99 (no youthful offenders under the age of 18), average length of stay 3 to 5 years, and security as described above. 11,338 inmates were received in the facility in the last 12 months (this is the reception facility for Central Florida counties).

The addresses of the satellite centers are:

Orlando Bridge, 2025 N. Mercy Dr., Orlando, FL 32808

Bridges of Orlando, 2007 N. Mercy Dr., Orlando, FL 32808

Orlando CRC, 7300 Laurel Hill Rd., Orlando, FL 32818

Kissimmee CRC, 2925 Michigan Ave., Kissimmee, FL 34744

Kissimmee TTH, 900 E. Pine St., Kissimmee, FL 34744

Cocoa Bridge, 585 Camp Rd., Cocoa, FL 32927

The Kissimmee CRC and the Orlando CRC are staffed by state employees who can be rotated out to the Units at the primary address facility (CFRC); and the four other centers are staffed by private contractors and subject to the provisions of PREA standard 115.12.

The number of staff at Central Florida reception center is 658; 8 administration, 565 security, 85 program; (again note contract staff at four of the reentry/community centers). Shifts for security runs 7 a.m. to 7 p.m. and 7 p.m. to 7 a.m. There are 117 contracted medical staff (some part-time) from the healthcare company, Centurion Incorporated.

Special note concerning PREA: these six community/reentry centers are PREA compliant and the auditors wish to emphasize that the very nature of the satellite/community facilities attached to CFRC "was one of "reentry/becoming involved in the community, getting on with one's life outside of prisons and not associated with the stereotypical "prison environment". The auditors noted that PREA is emphasized everywhere, but clearly after discussions with inmates at the satellite/centers they themselves were very complementary of the community programs that they were involved in and were very complementary of the safety and security shared by the "resident" population.

The physical plant at the primary address consists of 43 buildings, including inmate housing as follows:  
10 single cell housing units

8 multiple occupancy cell housing units

11 open bay/dorm housing units

258 Segregation cells.

The Main Unit is a double fenced, armed patrolled, mile plus, rectangular/oval type compound with a front and rear gate. The compound itself consists of North and South sections with segregation cells, and housing units as described above. There is also a education, classification and transition programs building, a Chapel, a Library, an office building A, laundry, food service and maintenance building, a multipurpose, healthcare building, recreation yards, and a control complex at the front gate. The administration building and parking lots sit at the entrance of the facility. Maintenance and warehousing is outside to the rear of the fenced compound.

The East Unit is a rectangular fenced compound a little smaller than the Main Unit with a control and administration building at the front entrance. The Unit contains dormitories in the center of the compound with wellness and recreation yards to one side of the center and laundry, food service, visiting, medical, classification, security and a Chapel to the other side of the centrally located housing.

The South unit is a motel style fenced unit with a small, recreation yard and 124 man occupancy of two to four man rooms, for its 72 population count housing unit.

CFRC is a reception unit and therefor primarily most of its inmate population is involved in the reception process and/or awaiting transfer to their permanent facility. It does have academic and vocational programming, offender work programs primarily in support services such as laundry, food service, maintenance, janitorial, the special assignments and support areas of the Chapel, recreation, medical, classification, community services, etc.

The auditors wish to reiterate the impressiveness of the CFRC regarding its commitment to zero tolerance concerning sexual abuse and sexual harassment in prison, and to PREA compliance. The interviews of staff and inmates supports and supplements the auditors finding that this facility is PREA compliant. This is a Final Report.

The Mission of the Agency/CFRC is as follows:

"To protect the public safety, to ensure the safety of department personnel, and to provide proper care and supervision of all offenders under our jurisdiction while assisting, as appropriate, their reentry into society."

Central Florida Reception Center is an accredited facility, accredited by the American Correctional Association.

<b>AUDIT FINDINGS</b>	
<p><b>Summary of Audit Findings:</b></p> <p>The summary should include the number of standards exceeded, number of standards met, and number of standards not met, along with a list of each of the standards in each category. If relevant, provide a summarized description of the corrective action plan, including deficiencies observed, recommendations made, actions taken by the agency, relevant timelines, and methods used by the auditor to reassess compliance.</p> <p>Auditor Note: No standard should be found to be “Not Applicable” or “NA”. A compliance determination must be made for each standard.</p>	
<b>Number of standards exceeded:</b>	3
<b>Number of standards met:</b>	42
<b>Number of standards not met:</b>	0
<p>Number of standards exceeded: 3            Number of standards met: 42            Number of standards not met: 0</p> <p>Number of standards exceeded: 3,            115.31 Employee Training (knowledge of the staff at CFRC)            115.54 Third-Party Reporting (complaint form on the website)            115.76 Disciplinary Sanctions for Staff (staff following the rules, including not using abusive language, etc.)</p> <p>Number of standards met 42            all standards from 115.11 to 115.89, 40 (excluding the three standards that exceeds) and the two added standards 115.401 and 115.403; total met 42</p> <p>Number of standards not met 0            Zero standards not met.-This is a Final Report.</p>	

## Standards

### Auditor Overall Determination Definitions

- Exceeds Standard  
(Substantially exceeds requirement of standard)
- Meets Standard  
(substantial compliance; complies in all material ways with the stand for the relevant review period)
- Does Not Meet Standard  
(requires corrective actions)

### Auditor Discussion Instructions

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

115.11	<b>Zero tolerance of sexual abuse and sexual harassment; PREA coordinator</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>As detailed in the opening audit narrative, two certified PREA Auditors audited Central Florida Reception Center (CFRC). To these auditors, it was clear that the Florida Department of Corrections (FDC) has a zero tolerance policy of sexual abuse and a zero tolerance policy of sexual harassment. The FDC Procedure 602.053 Prison Rape: Prevention, Detection and Response clearly outlines and mandates zero-tolerance toward all forms of sexual abuse and sexual harassment in facilities it operates, or has under contract.</p> <p>The purpose of the Procedure is "To establish a zero tolerance standard for sexual abuse, sexual battery, staff sexual misconduct, and sexual harassment in institutions and community corrections while protecting the rights of inmates and offenders, regardless of gender or sexual preference, through accountability of perpetrators, and the punishment of those institutional and community correctional officials who failed to prevent, detect, and respond to sexual abuse, sexual battery, and sexual harassment crimes for incarcerated inmates and those offenders under the Departmental jurisdiction." Also, the Procedure, directs that an inmate cannot consent to sexual or romantic behavior with staff, contractor or volunteer. The auditors also felt that this procedure, which outlines the following: prevention, reporting, response, posts sexual battery guidelines, medical and mental health care, data collection and analysis, the Bureau of Personnel Information, inmate discipline, investigations, case records, and PREA Coordinator and Compliance Manager duties; establishes and insures a strong foundation to meet Prison Rape Elimination Act standards as detailed in this report.</p> <p>This strong language of the Procedure and the fact that prevention, detection and response is outlined in Sexual Abuse Awareness pamphlets, is posted on bulletin boards throughout the facility, and is detailed in Employee Handbooks and the Inmate Orientation Handbooks/Manuals, further convinced the auditors that FDC is committed to compliance with the Prison Rape Elimination Act (PREA). The facility, CFRC, and the Department specifically address the facility's approach, implementation, and response to establish zero tolerance through the response/Coordination Plan, through facility reviews, and through the training of staff, contractors, volunteers, and inmates.</p> <p>The two-person audit team also reviewed organizational charts of the FDC and the Central Florida Reception Center, interviewed the Secretary of the Florida Department of Corrections, the Agency PREA Coordinator, the Warden, and the Institutional PREA Manager. Organizational charts reflect that the Secretary was the head of the Department and the Warden was the head of the Institution. Both indicated, during interviews, they were committed to PREA compliance. The Agency PREA Coordinator held a position in upper management and the Institutional PREA Manager was an Assistant Warden at CFRC with authority over PREA compliance at each of the facility units (Main, East, and South) and the satellite units (two Bridges of Orlando, the Cocoa Bridge, Kissimmee Community Release Center, and the Transition House). Both the Coordinator and the Manager indicated, during their interviews, that they had time to accomplish their jobs and report to top management. This communication with top management was further evidenced by working with the Coordinator and the Manager at several facilities.</p>

It is noted by the Auditors that during their four-day visit, all staff, contractors, volunteers, and inmates, who were formally and informally interviewed, were aware of the agency's policy of zero tolerance of sexual abuse and sexual harassment in the FDC and CFRC.

The auditors; based on their interviews, both formal and informal, based on the FDC and CFRC procedures, and based on the posters throughout the facility, the pamphlets, and the handbooks, and based on observation of the operations, including intake and orientation, assessed this standard as compliant, "meets standard".

115.12	<b>Contracting with other entities for the confinement of inmates</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The Florida Department of Corrections and CFRC have entered into or renewed a contract for the confinement of inmates in the Orlando area which includes the following: 1) Cocoa Bridge, 80 residents, 2) Orlando Bridge, 131 residents, 3) Orlando Bridge Transitional Services, 145 residents, 4) Transition House Incorporated, 66 residents.</p> <p>The PREA auditors reviewed the following contracts between the FDC and 1) Bridges of America-the Cocoa Bridge Incorporated, contract #C2807 population 80; 2) Bridges of America-The Orlando Bridge Inc., contract #C2842 population 131; 3) Bridges of America-The Orlando Bridge, Inc., contract #2489 population 145; and 4) The Transition House, Inc., contract #C2830 population 66. The contracts are clear and contain the verbiage concerning the Prison Rape Elimination Act (PREA) - "The contractor will comply with the national standards to prevent, detect, and respond to prison rape under the Prison Rape Elimination Act (PREA), Federal Rule 28 C.F.R. Part 115. The Contractor will comply with the Department policies and procedures that relate to PREA."</p> <p>Additionally, the auditors visited each center/facility, interviewed staff and inmates, and observed the conditions of confinement. Inmates were interviewed formally and informally, and staff were interviewed formally and informally. The interviews were very positive and complimentary of the operation of these "halfway" houses. Inmates and staff both describe the conditions of confinement, such as security, programs, access to community services, and reentry procedures as good to excellent.</p> <p>Based on the interviews with the Secretary of the FDC, the PREA Coordinator of the FDC, the PREA Manager of the CFRC, the lead staff of each facility, the inmates at each facility, and based on the observation of daily operations, work and program opportunities, and communications between staff and inmates, the auditors assess this standard as compliant, "meets standard".</p>

115.13	<b>Supervision and monitoring</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The CFRC has its and the institution's specific staffing plan, titled: FDC Central Florida Reception Center Staffing Plan. The plan itself describes daily staffing that is required for the security and safety of staff, visitors, and inmates. The staffing is based on post-charts developed by the FDC Bureau of Security Operations, and has listings of all security posts that are necessary to operate the institution, including relief positions, based on an average daily population of 2801 inmates. Specific considerations are also given to the satellite facilities in Orlando, Kissimmee, and Cocoa.</p> <p>It is noted by the auditors that CFRC is primarily a "reception center" and its satellite centers are "reentry" facilities which encompass inmates and residents on their entry into the state prison system and their release from the state prison system. These two ends of the prison spectrum tend to generally serve for best behavior by the inmate population, thus affording staff, at the institution/facilities, the ability to change the culture and to emphasize safety and security in relation to PREA. CFRC is doing this, helping change the culture and helping secure a positive reentry through the Bridges and other reentry centers.</p> <p>"The Staffing Plan is utilized to ensure adequate staffing levels are in place to protect inmates from sexual abuse." This is the first sentence of the staffing plan for CFRC. It follows with 18 pages of detail describing staffing, post assignments, security procedures, and takes into consideration the following:</p> <ol style="list-style-type: none"> <li>1. Generally accepted detention and correctional practices.</li> <li>2. Any judicial findings of inadequacy.</li> <li>3. Any findings of inadequacy from federal investigative agencies.</li> <li>4. Any findings of inadequacy from internal or external oversight bodies.</li> <li>5. All components of the facility's physical plant.</li> <li>6. The composition of the inmate population.</li> <li>7. The number and placement of supervisory staff.</li> <li>8. Institutional programs occurring on a particular shift</li> <li>9. Any applicable state or local laws, regulations, standards</li> <li>10. The prevalence of substantiated and unsubstantiated instances of sexual abuse and</li> <li>11. Any other relevant factors.</li> </ol> <p>This is all covered in several pages of the staffing plan itself for CFRC and its units and satellites. The auditors were impressed with the thoroughness and the emphasis of the staffing plan to secure the safety of all those who work, volunteer, visit, or who are incarcerated at CFRC. Repeatedly, the plan indicates its outline for helping ensure safety and security.</p> <p>In addition to the plan, it was clear that CFRC is committed to best practices making sure the documentation of any deviation from the plan is maintained, making sure that appropriate staff are notified of any deviations, and making sure that adjustments are addressed to improving staffing, safety, and security. Deviations from the staffing plan have primarily been staff shortages occurring through unscheduled absences, extended illness, Family Medical Leave</p>

Act, military, and natural disasters (much of this information documented in the Pre-Audit Questionnaire (PAQ)).

The annual PREA staffing review took into consideration the following five areas: 1) the Staffing Plan, 2) video monitoring technology, 3) deviations from the staffing plan, 4) reasons and additional recommendations or comments, and 5) reviews and approval. It was noted by the auditors that there were 288 interal cameras in the housing units and in common areas (not interfering with PREA viewing compliance).

The auditors reviewed post orders of intermediate and higher-level staff which require them to conduct unannounced rounds. Additionally, housing logs documented supervisory rounds, as well as shift notes. Higher and intermediate level staff were asked specialized questions concerning unannounced rounds and all indicated that they made rounds and changed routines, times, and routes, to help ensure staff was not alerting one another to these unannounced rounds. Unannounced rounds cover all shifts and wherever staff are posted.

Based on the Staffing Plan, the auditors' review of the Plan, the post-charts, the observation of security operations, and based on interviews with random staff, and higher level and intermediate level staff, the facility tour, the review of video technology, and the documentation associated with the standard, the auditors assess this standard as "meets standard".

115.14	Youthful inmates
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>CFRC is an adult correctional institution of the FDC and there are no youthful offenders under the age of 18 at the Central Florida Reception Center, it's units or satellites. The FDC does not house inmates under the age of 18 at this facility. This standard is assessed as nonapplicable, thus "meets standard".</p> <p>It is noted that 2008 Florida Statutes indicate that inmates under the age of 18 will not be housed with inmates age 18 or older.</p>

115.15	<b>Limits to cross-gender viewing and searches</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>FDC Procedure 602.018 Contraband and Searches of Inmates; FDC Procedure 602.036 Gender Specific Security Positions, Shifts, Posts, and Assignments, and Florida Administrative Code (FAC) Rule 33-602.204; addresses Searches of Inmates. It is clearly stated "strip searches of inmates shall be conducted only by correctional officers who shall be of the same sex as the inmate, except in emergency circumstances." It is also indicated that body cavity searches will only be done by medical staff. Further, Procedure 602.036, is quoted "inmates will not be supervised by officers of the opposite gender while inmates are showering or are in the toilet areas, unless appropriate privacy screening is provided to obscure from view". These Procedures and Rule do further direct the limits to cross-gender viewing and searches.</p> <p>In the past 12 months there have been zero (0) number of cross gender strip or cross gender visual body cavity searches of inmates. Additionally, in the past 12 months there have been zero (0) number of cross gender strip or cross gender visual body cavity searches of inmates that did not involve exigent circumstances or were performed by nonmedical staff. This information taken from the Pre-Audit Questionnaire (PAQ).</p> <p>The facility does not permit cross gender patdown searches of female inmates absent exigent circumstances at the facility or the satellite facility. It is noted that the main institution and its units does not house female inmates. There have been no searches of female inmates conducted by male staff at the main institution or the satellite facilities. The policy does require that cross gender patdown searches of female inmates be documented but, as noted, none have been done.</p> <p>Screening materials, such as shower curtains, doors, or walls, enable inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing breast, buttocks or genitalia, except in exigent circumstances (this includes video).</p> <p>Staff of the opposite gender announce their presence when entering a inmate housing unit. This was observed by the auditors when touring the facility and when reentering housing areas of CFRC and its satellites.</p> <p>The FDC Procedures prohibit staff from searching or physically examining transgender or intersex inmates for the sole purpose of determining the inmates genital status. The Pre-Audit Questionnaire (PAQ) documents policies, procedures, and information concerning this and the above.</p> <p>100% of all security staff have received training on conducting cross gender patdown searches and searches of transgender and intersex inmates in a respectful and professional manner. Employee training curriculum was reviewed and the lesson plan concerning, Frisk and Searches.</p> <p>Based on the interviews of staff and inmates, the review of policy and procedures, as well as the auditors' review and observation of the operations of CFRC, the auditors assess this</p>

standard as compliant, "meets standard".

115.16	<b>Inmates with disabilities and inmates who are limited English proficient</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Both PREA auditors worked closely with the CFRC Assistant Warden, who was responsible for both PREA compliance and adherence to the Americans with Disabilities Act (ADA) 1990. It was noticeable that her knowledge of both PREA and the ADA was and is a significant influence on PREA compliance and making sure there is no discrimination against individuals with disabilities.</p> <p>FDC and CFRC have Procedures that provide that disabled inmates, as well as inmates who are limited English proficient, are able to participate in and benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment in prison. Procedure 602.053 Prison Rape: Prevention, Detection, and Response, states "Inmates with recognized disabilities and Limited English Proficiency (LEP) shall be advised of the Department's zero-tolerance policy on sexual abuse, sexual battery, staff sexual misconduct, and sexual harassment in accordance with the resources outlined in 'Americans with Disabilities Act Provisions for Inmates,'" (this last a FDC Procedure 604.101, Americans with Disabilities Act Provisions for Inmates). This Procedure includes such resources as materials with large print; close captioning and signing of video material; reading of materials to inmates, as appropriate; translators, as appropriate; translations, especially Spanish to the large Spanish-speaking population; language line services; and other suggestions and resources.</p> <p>CFRC staff have been trained and alerted to CFRC's commitment to Limited English Proficient inmates, assisting with translation efforts and interpretation efforts to ensure effective communications and to ensure that all inmates will benefit from PREA.</p> <p>Contract number #902-0580410 with dial number 1-866-874-3972 provides for Language Line Services and tips for interpretive services. Additionally, CFRC has over 50 Spanish translators, 11 Creole translators, and many other identified translators with Italian, Romanian, Russian, Ukrainian, French, and other language capabilities. Five sign language translators were also identified and available. The auditors spoke to inmates with Limited English Proficiency (LEP) and had no difficulty obtaining assistance with translation, technical assistance, or other assisted communications. It is also noted that the agency prohibits use of inmate interpreters, except in very limited circumstances. However, the auditors wish to note the following: in the past 12 months there have been zero (0) number of instances where inmate interpreters, readers, or other types of inmate assistants have been used (this information taken from the Pre-Audit Questionnaire)..</p> <p>The auditors used the above information and their reviews of posters, inmate handbooks, Spanish-language information, and interviews with staff, random inmates, LEP inmates and disabled inmates to assess this standard as compliant, "meets standard".</p>

115.17	<b>Hiring and promotion decisions</b>
	<p data-bbox="248 168 898 203"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="248 248 523 284"><b>Auditor Discussion</b></p> <p data-bbox="248 329 1477 701">Florida Statutes require employee screening. All employees are required by law to undergo background screening and this begins with Chapter 435, Florida Statutes (FS) and reinforced by the Department of Corrections policies and procedures to assist further with screening of staff, contractors, volunteers, interns who may have contact with inmates, and who may have engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, or such sexual battery or sexual activity. All of this screening to assist in the prevention of sexual abuse and/or sexual harassment as outlined by PREA.</p> <p data-bbox="248 757 1477 1384">FDC Procedure 208.049 Background Investigations and Appointment of Certified Officers specifically addresses background information/investigations and the appointment of Correctional Officers who are certified by the state. The purpose of this procedure is to "set forth guidelines...". The guidelines include a checklist of 35 items that address such things as veterans preference, supplemental application questionnaire, new hire profile information, fingerprints, domestic violence affidavit, authority for release of information, interview questions, drug and alcohol testing consent, employment verifications, and etc. This background check requirement is done at state and institutional level, and the centralized recruitment center verifies this Florida Department of Corrections background check. This checklist is titled Florida Department of Corrections Correctional Officer Background Investigation Checklist. Further, there is a Supplemental Questionnaire and Applicant Release of Information for Non-Security Positions, supplementing the State of Florida Application. Finally, contractors and volunteers are covered by application and the "Prison Rape Elimination Act Training for Interns, Volunteers, and Contractors Read and Sign", NI1-127 which addresses the PREA issues in this standard.</p> <p data-bbox="248 1440 1477 1597">The auditors noted that the National Crime Information Center (NCIC), the Florida Crime Information Center (FCIC), the Florida Personnel Applicant Tracking System (PATS), are used in assessing and screening applicants (all staff, volunteers, contractors, and interns who are employed or authorized have this background check).</p> <p data-bbox="248 1653 1477 1854">In the past 12 months there have been 158 persons hired who have contact with inmates and have had criminal background record checks done, additionally, in the past 12 months there have been there have been 23 contracts for services and 100% have had background record checks. This information supplied in advance and taken from the CFRC Pre-Audit Questionnaire.</p> <p data-bbox="248 1910 1477 2112">As an active check, the FDC has a "digID+ Scanner" system that continually updates background information for all its staff that have contact with inmates. Additionally, the Bureau of Personnel records all documents related to an employee disciplinary action resulting from actions taken relative to Procedure 602.053 Prison Rape: Prevention, Detection, and Response, the essential FDC zero-tolerance policy.</p>

Based on the Florida Statutes and FDC Procedures mentioned above; based on the state, federal and local checks and checklists by the Bureau of Personnel, based on the live scan "digID+ Scanner" system; and based on the interviews with the Human Resource staff, supervisory staff, and the Warden; the auditors assess this standard as compliant, "meets standard".

<b>115.18</b>	<b>Upgrades to facilities and technologies</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>As documented by the Pre-Audit Questionnaire, which the auditors received in advance from CFRC, and confirmed by staff interviews and observation during the site visit at CFRC, the facility has not made substantial expansion or modification to its facilities since the last PREA audit.</p> <p>The facility has updated its video monitoring system. The auditors reviewed the upgrade, expansion and timing of the facility's monitoring system. There are 288, internal cameras and 16 external cameras at the main complex, and appropriate cameras at the satellite facilities, assisting with the prevention, detection and response to rape in prison at the CFRC. Brand-name for the digital video recorders and cameras is Ever Focus, a CCTV system installation.</p> <p>Based on review by the auditors of the facility and satellites during the on-site visit, and the camera/video recording system, this standard is assessed as "meets standard".</p>

115.21	<b>Evidence protocol and forensic medical examinations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Evidence protocol and forensic examinations are appropriately handled at CFRC. The protocol is adapted from the most recent edition of DOJ's (Department of Justice) Office on Violence Against Women Publication "A National Protocol for Sexual Assault Medical Forensic Examinations, Adult/Adolescents" (the auditors reviewed the eight-page Adult/Adolescent Forensic Sexual Assault Examination format). The format that was reviewed by the auditors gave a comprehensive, detailed and graphic report of the examination. These examinations are performed by SAFE/SANE, contracted medical staff done at the facility (or if emergency, at the hospital).</p> <p>Investigations are the responsibility of the FDC, through the Office of the Inspector General (OIG), who have statutory authority and responsibility to conduct criminal investigations, including inmate on inmate sexual abuse or staff sexual misconduct. They also have OIG responsibility to the governor's Office Inspector General. Further, information was reviewed by the auditors on the OIG's public website.</p> <p>In the past 12 months there have been three (3) forensic medical examinations conducted and all three were performed by SAFE/SANE medical staff. Evidence protocol and the prescribed forensic exam formats were followed. The auditors reviewed this information.</p> <p>Victim Advocacy Services are available to the inmates and there is a Memorandum of Agreement between the Victim Service Center of Central Florida and CFRC. This agreement was reviewed by the auditors. This Memorandum of Agreement states it is "to collaborate as partners to provide advocacy services for incarcerated victims of sexual assault." If requested by the victim, community-based services are offered as outlined by contract or a qualified agency staff member is made available. In the past 12 months, CFRC did not have to use a community-based organization or a qualified agency staff member to provide advocate services.</p> <p>Based on the auditors' review of a) investigative protocols and procedures, the OIG's website; b) forensic sexual assault examination protocols and format, the list of sexual assault forensic nurse examiners and certifications provided and retained by the facility of these forensic nurse examiners; c) the Memorandum of Agreement mentioned above; and d) interviews with investigators, medical staff, victim advocates, and institutional staff (including the PREA Coordinator and Warden), the auditors assess this standard as compliant, "meets standard".</p>

115.22	<b>Policies to ensure referrals of allegations for investigations</b>
	<p data-bbox="252 170 896 203"><b>Auditor Overall Determination:</b> Meets Standard</p> <p data-bbox="252 248 523 282"><b>Auditor Discussion</b></p> <p data-bbox="252 327 1465 875">Florida Statutes Chapter 944, Criminal Procedure and Corrections states "Inspector General; inspectors; and duties.-The Inspector General shall be responsible for prison inspection, investigation, internal affairs investigations, and management reviews". FDC Procedure 108.003 Investigative Process, Office of the Inspector General, states its purpose, "To establish the authority, and responsibilities of the Office of the Inspector General, (OIG), responsibility, function, and processing of administrative, criminal, equal employment opportunity, contract, and whistleblower investigations, to establish responsibility for the preservation of evidence, and notification of report dispositions." Further, the OIG's website indicates PREA responsibility, and investigation and includes a complaint form. Procedure 108.015 Sexual Battery, Sexual Harassment, and Sexual Misconduct Investigations, establishes guidelines "for the investigation of sexual abuse, sexual battery, sexual misconduct, staff on inmate sexual harassment or voyeurism allegations within the Department of Corrections."</p> <p data-bbox="252 925 1481 1171">The auditors interviewed OIG investigators who are responsible for independent investigations and have the legal authority to conduct criminal investigations. It is noted on the OIG website that "all our top investigative priorities include investigations into in custody deaths, public corruption and criminal efforts that compromise the safety and security of our prisons from violence, introductions/smuggling of contraband and sexual crimes/PREA (Prison Rape Elimination Act)".</p> <p data-bbox="252 1227 1485 1563">The Florida Statutes and these above procedures ensure that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment. In the past 12 months there have been 16 allegations of sexual abuse and sexual harassment that were received. Sixteen (16) of these resulted in administrative investigation, and three were referred for criminal investigation. Of these 16 allegations, 12 cases are still open and four had been closed. This information confirmed by the review of the auditors and the information supplied by the Pre-Audit Questionnaire. This information is documented and maintained. Open cases are still being considered.</p> <p data-bbox="252 1615 1485 1771">Based on the auditors' review of investigations, review of the FDC Procedures, and the procedures of the OIG; and based on the interviews with the Warden, OIG investigators, the Agency PREA Coordinator, and other key staff, this standard is assessed as compliant, "meets standard".</p>

115.31	<b>Employee training</b>
	<p data-bbox="252 170 927 203"><b>Auditor Overall Determination:</b> Exceeds Standard</p> <p data-bbox="252 248 523 282"><b>Auditor Discussion</b></p> <p data-bbox="252 327 1477 573">Noticeable to the auditors at CFRC, was the diversity of staff and the interest that the Warden, Assistant Wardens, the PREA Manager, and trainers take in educating the staff and an inclusiveness/ownership of the CFRC mission and program. It is for this reason that the two PREA auditors assess this standard as "exceeds" and not just "meets" standard. The training curriculum, the procedures, and the education processes all mirror the agency's direction and outline that is the leadership staff at CFRC that brings about an exceeds assessment.</p> <p data-bbox="252 629 1469 831">Procedure 602.053, Prison Rape: Prevention, Detection, and Response indicates that all staff will be thoroughly trained about the Department zero-tolerance policy. Moreover, the Department, through its policies and procedures, has comprehensive and thorough training plans, instructor guides, e-learning, and specifically, the booklet, Effective and Professional Communication with LGBTI Offenders Instruction, that cover the following topics:</p> <ol data-bbox="252 887 1445 1346" style="list-style-type: none"> <li>1) agency zero-tolerance policy,</li> <li>2) how to fulfill PREA responsibilities,</li> <li>3) inmates right to be free from sexual abuse,</li> <li>4) the right of inmates and employees to be free from retaliation for reporting sexual abuse,</li> <li>5) the dynamics of sexual abuse in confinement,</li> <li>6) common reactions of sexual abuse/sexual harassment victims,</li> <li>7) how to detect and respond to signs of threatened and actual sexual abuse,</li> <li>8) how to avoid inappropriate relationships,</li> <li>9) how to communicate effectively and professionally with inmates including lesbian, gay, bisexual, transgender, and intersex inmates, and</li> <li>10) how to comply with relevant laws related to mandatory reporting.</li> </ol> <p data-bbox="252 1357 1458 1469">Also defined by the policy is a summary of objectives that the FDC has on how to deal with interpreters and the hearing impaired, how to consider inmate protection, specifics about the code of silence, and scenarios.</p> <p data-bbox="252 1525 1469 1682">Interviews with staff confirmed the effectiveness of this training which occurs annually and exceeds the two-year requirement of PREA. Additionally, "post orders", first responder duties, communications, and safety were discussed with officers on post. Staff were knowledgeable/well-trained and felt that both inmates and staff were safe at CFRC.</p> <p data-bbox="252 1738 1422 1861">The agency documents that all employees who have contact with inmates understand the training they have received through employee signature. Documentation of training is maintained as part of the training record.</p> <p data-bbox="252 1917 1453 2029">Based upon the information above, observation of the daily operations at the facility, and the many formal and informal interviews conducted by the two auditors with staff and inmates throughout the facility, the auditors assess this employee training as "exceeds standard".</p>

<b>115.32</b>	<b>Volunteer and contractor training</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>All contractors, volunteers and interns who have contact with inmates have been trained as outlined in the lesson plan, Prison Rape Elimination Act Training for Interns, Volunteers, and Contractors. This training is directed by Procedure 602.053 Prison Rape: Prevention, Detection, and Response; Procedure 108.015, Sexual Battery, Sexual Harassment, and Sexual Misconduct Investigations; Staff Development and Training Lesson Plan and New Employee Orientation. This training covers the zero-tolerance policy, rights of inmates and offenders, and reporting procedures including taking all reports seriously.</p> <p>Volunteers, contractors, and interns must confirm that they have received training for which they are "eligible to receive two (2) credits for training." The auditors reviewed signed training affidavits. The auditors also interviewed volunteers, former interns and contractors.</p> <p>Based on the procedures, the lesson plan, documentation, and based on interviews with key staff, volunteers, former interns and contractors, the auditors assess this standard as "meets standard".</p>

<b>115.33</b>	<b>Inmate education</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The Pre-Audit Questionnaire documented two significant contributions the CFRC makes to the agency and to the inmate population. In the past 12 months, there were 11,338 inmates who were admitted to the FDC and received timely information about the zero tolerance policy and how to report instances or suspicions of sexual abuse or sexual harassment. Additionally, within 30 days of intake, 5,559 inmates who were admitted and who were there for more than 30 days received comprehensive education on their rights to be free from sexual abuse and sexual harassment, and their right to be free from retaliation for reporting such incidents. It was also noted by the auditors that the agency policy requires that inmates are transferred from one facility to another be educated regarding their rights reference to PREA.</p> <p>CFRC is a Reception Center and this is the reason for such large numbers of inmate PREA education and follow up. Education for inmates, is available in formats that make it accessible to all inmates, including those that are visually impaired, have limited reading skills, those who are limited English proficient, and those otherwise disabled. This training and education is documented by the facility.</p> <p>Inmate orientation and training is directed by FDC Procedure 601.210 Inmate Orientation. This Procedure, directs:</p> <ol style="list-style-type: none"> <li>1) inmate orientation at a permanent facility or satellite facility,</li> <li>2) initial orientation,</li> <li>3) orientation and sexual assault,</li> <li>4) comprehensive orientation (including PREA), and</li> <li>5) institutional orientation.</li> </ol> <p>The auditors reviewed key documents that were distributed, including inmate handbooks in English and Spanish, the Florida Department of Corrections Sexual Abuse Awareness pamphlet; and reviewed posters and bulletin board notices concerning PREA. Additionally, inmate intake was observed by the auditors, including the video for PREA, staff, introduction and communication to new inmates, and individualized treatment, as appropriate, during the intake process.</p> <p>Based on the two auditors formal and informal interviews of numerous inmates, based on the positive answers received from questions outlined in scripted interviews, based on the orientation and intake process at this reception facility, and further based on the auditors review of acknowledgment forms, documents, and inmate education process, the auditors assess this standard as compliant, "meets standard".</p>

<b>115.34</b>	<b>Specialized training: Investigations</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The Procedure 602.053 Prison Rape: Prevention, Detection, and Response requires that, in addition to the general PREA training all staff receive, investigators who work regularly with inmates shall complete specialized training. The auditors reviewed, investigator training files and noted special certifications for advanced training (120 investigators have received this advanced training according to the PAQ). The auditors observed advanced training that included, investigations in confinement settings, with a curriculum established by the Moss Group (Investigating Sexual Abuse in Confinement Settings: Training for Investigators). This training outlined included the following:</p> <ol style="list-style-type: none"> <li>1) techniques for interviewing sexual abuse victims,</li> <li>2) proper use of Miranda and Garrity warnings,</li> <li>3) collection of evidence in confinement settings, and</li> <li>4) criteria and evidence required to substantiate any case for administrative action or prosecution referral.</li> </ol> <p>The auditors were impressed with the overall knowledge and expertise exhibited by the OIG inspectors when interviewed and when discussing PREA. The auditors were also impressed with the OIG website and the information contained therein including third-party reporting and PREA reporting.</p> <p>Based on the auditors' review of the specialized training, the records documenting the specialized training, the curriculum, and interviews with the investigative staff, this standard is assessed as compliant, "meets standard".</p>

<b>115.35</b>	<b>Specialized training: Medical and mental health care</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Centurion Healthcare provides medical and mental health staff for CFRC. In addition to the PREA general training outlined in standards 115.31 and 115.32, medical staff received specialized training. Centurion and CFRC work together to make sure all full-time and part-time medical and mental health staff who work regularly in the facility were trained in the following:</p> <ol style="list-style-type: none"> <li>1) how to detect and assess signs of sexual abuse,</li> <li>2) how to preserve physical evidence of sexual abuse, and</li> <li>3) how to respond effectively and professionally to victims of sexual abuse.</li> </ol> <p>Further, the agency maintains documentation that all medical and mental health staff have received this training either from the agency or elsewhere. Centurion goes on to further expand the specialized training to include confidentiality; to include signs of sexual abuse, physical and emotional reactions; gender and sexual orientation considerations; voice and speech; body positioning; distance; eye contact; reporting requirements; medical action treatment; and forms (forms regarding sexual battery protocol; coding forms; chronological record of healthcare; consent and authorization for use and disclosure, inspection and release of confidential information).</p> <p>118 medical and mental health care practitioners who regularly work at CFRC received this training. 100% of medical and mental health care practitioners who work regularly at CFRC have received the training required. Documentation is maintained of all training.</p> <p>Forensic exams are not conducted by Centurion medical contracted staff who work at the CFRC. SAFE/SANE practitioners are contracted through an agreement with Panhandle Forensic Nurse Specialists-Region 3, for the 12 institutions in this region.</p> <p>Based on the above policies and procedures, the review of training curriculum and specialized training, and based on interviews of medical and mental health care practitioners, administrative health care staff, and randomly selected health care staff at the facility, the auditors assess this standard, as compliant, "meets standard".</p>

115.41	<b>Screening for risk of victimization and abusiveness</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The FDC and CFRC have procedures that require screening, upon admission to a facility or transfer to another facility, for the risk of sexual abuse victimization or sexual abusiveness towards other inmates. Specifically, FDC has a Procedure 602.053 Prison Rape: Prevention, Detection, and Response which states that if an "inmate has experienced prior sexual victimization, or has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, the inmate shall be offered a follow-up meeting with medical or mental health practitioner within fourteen (14) days of the screening". FDC has a Procedure 601.209 RESTRICTED Reception Process - Initial Classification that directs the Reception Process (part of the main function of CFRC). This admission process talks about the Computer Assisted Reception Process (CARP), the National Crime Information Center (NCIC) and Florida Crime Information Center (FCIC), the Offender Based Information System (OBIS); and specific procedures of the initial intake.</p> <p>The Inmate Behavioral Assessments Scale (IBAS) and Sexual Risk Indicators (SRI), the Automated Space Management and the Inmate Risk Management Scale (IRMS) are all objective tools (restricted document tools) of the Bureau of Classification to assist with the inmate's, safety, security, and movement. These instruments were reviewed by the auditors, including the timeframes (within 72 hours and reassessed in 30 days if new information, etc. is received). Because CFRC is a reception center, 11,338 inmates, within the past 12 months, were screened within the 72 hours for the risk of sexual victimization or risk of sexually abusing other inmates. Additionally, 5559 inmates whose length of stay was for 30 days or more, were reassessed based on additional relevant information received at intake. Furthermore, during the intake screening, at a minimum, the CFRC takes into consideration the 10 bullet points of subsections 115.41 (c) and (d), documented above.</p> <p>Sensitive information obtained during this screening process is appropriately controlled and used only to assist inmates with proper housing, work assignments, program assignments, and the inmates safety and security.</p> <p>Based on review of the objective instruments and the intake and reception processes at this Central Florida Reception Center, based on interviews with inmates concerning the reception process and questions asked during intake, based on interviews with staff and specialty reception/intake staff, and based on the auditors review of operations, transfers, and assignments of inmates, this standard is assessed as compliant, "meets standard".</p>

<b>115.42</b>	<b>Use of screening information</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>The FDC and the CFRC use the screening information outlined in standard 115.41 with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive to make informed: housing assignments; work assignments; education assignments; program assignments; and appropriate transfers to the facilities throughout FDC.</p> <p>This assessment information is also used to ensure the health and safety of transgender and intersex inmates (reassessment is accomplished at least twice each year). Consideration is also given to each transgender or intersex inmate's own view with respect to his or her own safety. Other issues concerning transgender and intersex inmates at CFRC include case by case individual treatment concerning placement. The facility refrains from dedicated assignments to one location of lesbian, gay, bisexual, transgender, or intersex inmates. Case, program, housing, work, etc., assignments are on an individual basis. Transgender and intersex inmates are allowed to shower separately from other inmates.</p> <p>To repeat simply, classification at this facility is on an individual basis and is based on an objective screening instrument which considers the safety and security of the inmate. This individual treatment was noticed when observing and reviewing intake and the reception process. Moreover, there clearly was good communication between staff and inmates at this reception center.</p> <p>Based on the above information and again, based on interviews with staff and inmates, and observation of the operation of the CFRC, the auditors assess this standard as "meets standard".</p>

<b>115.43</b>	<b>Protective Custody</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>At CFRC, inmates at a high risk for sexual victimization will not be placed in involuntary segregated housing unless an assessment of all available alternatives has been made. This prohibition against the placement of inmates in protective involuntary segregated housing until and unless all alternative options are considered is outlined and directed by the policies of the Florida Administrative Code (FAC) 602.220 Administrative Confinement and 602.221 Protective Management. This is further enforced by the procedure 403.012. Identification and Management of Transgender Inmates, and Inmates Diagnosed with Gender Dysphoria which clearly directs the following: "the facility, and housing assignments, shall be made on a case-by-case basis considering the inmate's health and safety, as well as potential programming, management, and security concerns. An inmate's own views regarding safety shall be given careful consideration." Further, these policies and procedures indicate that inmates, if placed in involuntary segregated housing, are reviewed every 30 days.</p> <p>In the past 12 months there have been zero (0) number of inmates at risk of sexual victimization who were held in involuntary segregated housing for 1 to 24 hours awaiting completion of assessment at CFRC. Additionally, zero (0) number of inmates at risk for sexual victimization were assigned to involuntary segregated housing for longer than 30 days while awaiting alternative placement. A review of files, for inmates at risk of sexual victimization, revealed that zero (0) number of inmates were held in involuntary segregated housing in the past 12 months.</p> <p>Based on the auditors' review of the policies and procedures, observation of segregated housing, and interviews with staff and inmates, this standard is assessed as "meets standard".</p>

115.51	<b>Inmate reporting</b>
	<b>Auditor Overall Determination:</b> Meets Standard
	<b>Auditor Discussion</b>
	<p>Inmate reporting has established procedures for allowing multiple ways for the inmates to report and staff to report sexual abuse and sexual harassment. The auditors reviewed the following documents, procedures, policies, and practices, including:</p> <ol style="list-style-type: none"> <li>1) Procedure 602.053, Prison Rape: Prevention, Detection, and Response, the agency's zero tolerance policy and PREA overview, to address sexual abuse and sexual harassment in the agency.</li> <li>2) Posters throughout the CFRC which are both in Spanish and English.</li> <li>3) Orientation Handbook for inmates.</li> <li>4) The Sexual Abuse Awareness Brochure for each inmate.</li> <li>5) The Agreement between FDC and the Gulf Coast Children's Advocacy Agency for a statewide hotline.</li> <li>6) Advocacy hotline information, posters, in Spanish and English.</li> <li>7) Public website for TIPS-OIG-PREA, the Inspector General's Office.</li> <li>8) FDC form, DC6-210 Staff Report, Verbal PREA.</li> <li>9) Employee Handbook.</li> </ol> <p>To the auditors, after reviewing the above items, it was clear that the FDC and CFRC have established procedures for inmates to report sexual abuse or sexual harassment, and retaliation by other inmates or staff, for reporting sexual abuse or sexual harassment, and for reporting staff neglect or violation of responsibilities that may have contributed to sexual abuse or sexual harassment incidents.</p> <p>Specifically, after reviewing the above, and while on the on-site visit, the auditors took many opportunities to review inmate reporting procedures, including internal, external, and anonymous ways to report. Reporting procedures from the FDC Sexual Abuse Awareness pamphlet include the following:</p> <p>"1. Tell any staff member 2. Call *TIPS (inter-one, then eight, then *8477) 3. Call 8466 to report to an outside agency (enter 1, then 1, then 8466) 4. Submit an inmate request grievance 5. Tell a friend or family member who can report for you".</p> <p>Victim advocate information is also posted for either telephonic or written communication.</p> <p>Procedure 602.053 mentioned above, also outlines ways for inmates and offenders to report instances of sexual abuse, sexual battery, staff sexual misconduct, and sexual harassment as follows:</p> <ol style="list-style-type: none"> <li>1. A verbal report to any staff member, volunteer, or contractor;</li> <li>2. Calling the TIPS line (866-246-4412 or *8477, for inmates);</li> <li>3. Filing an "Inmate Request," DC 6-236;</li> <li>4. Filing an informal and/or formal grievance;</li> <li>5. Having a family member, friend, or other member of the public fill out the online citizens complaint form;</li> <li>6. Having a family member, friend or other member of the public submit a third (3rd) party grievance;</li> <li>7. Write or e-mail the Office of the Inspector General;</li> </ol>

8. Write or e-mailed the PREA Coordinator

It was noted by the auditors that all reports of sexual abuse are referred to the OIG, Inspector General Office (anonymous reports can be reported to the OIG). The agency requires documentation of reports of sexual abuse and sexual harassment.

Staff can privately report instances of sexual abuse to the Chief Correctional Officer, Warden, Office of the Inspector General, or the Agency PREA Coordinator.

Inmates are not detained solely for civil immigration purposes by the FDC.

Based on the above information, and interviews with staff and inmates at the facility, the auditors assess this standard as compliant, "meets standard".

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## 115.52 Exhaustion of administrative remedies

**Auditor Overall Determination:** Meets Standard

### **Auditor Discussion**

The FDC has specific rules and administrative procedures for dealing with inmate grievances regarding sexual abuse as outlined in the of Florida Administrative Code (FAC), Chapter 33-103.005 Informal Grievance; and Chapter 33-103.006 Formal Grievance. These rules address the formal and informal processes, time limits, submission, response time, and final decisions.

The rules indicate informal "grievances regarding allegations of sexual abuse... may proceed directly to the office of the secretary...".The rules further indicate that formal grievances "alleging sexual abuse as defined in subsection 33-103.002 (17), FAC 1. If an inmate believes he or she is the victim of sexual abuse they should immediately report it. There are several ways that allegations of sexual abuse may be reported, filing a grievances is one of those ways. If an inmate decides to use the grievance process to report sexual abuse they must complete form, DC 1-303, Requests for Administrative Remedy or Appeal and file within the requirements and guidelines listed below. This rule is established to meet the requirements of the Prison Rape Elimination Act (PREA) of 2003. 28 CFR Part 115." These quotes taken directly from the Florida Administrative Code, as mentioned above.

In the past 12 months, CFRC has not had a grievance filed reference sexual abuse. There have been zero (0) number of grievances alleging sexual abuse, zero (0) number of grievances alleging substantial risk of sexual abuse, nor grievances filed in bad faith. This information documented on the PAQ and supported by interviews of staff and inmates.

Based on the auditors' review of grievances, the information outlined in the Florida Administrative Code, and interviews with staff and inmates both formal and informal, this standard is assessed as compliant, "meets standard".

## **115.53 Inmate access to outside confidential support services**

**Auditor Overall Determination:** Meets Standard

### **Auditor Discussion**

CFRC provides inmates with access to outside victim advocates for emotional support services related to sexual abuse. Victim services are stipulated and outlined by Procedure 602.053, Prison Rape: Prevention, Detection, and Response. This is the basic procedure for FDC and CFRC establishing the foundation for PREA compliance. The procedure indicates "Any inmate who alleges sexual abuse or sexual battery shall be given a copy of the NI1-120 and advised of her/his right to access crisis intervention services, to have a forensic examination, and to have a victim advocate present during the forensic examination and/or the investigative interview, if s/he chooses." This part of the procedures to be documented. It is also noted that the procedures delineate confidentiality.

The auditors reviewed the following agreement and inmate information: 1) Memorandum of Agreement between the Florida Department of Corrections and the Victim Service Center of Central Florida, Inc.; 2) the Inmate PREA Education Facilitators Guide Instruction for Reception Centers; 3), the Inmate Orientation Handbook, Reception Center Processing; and 4) the Sexual Abuse Awareness pamphlet. The agreement offers to provide services to incarcerated victims of sexual violence in Orange and Osceola counties (FL). The Facilitators Guide indicates contact can be made to the local crisis center and offers a calling number or writing to Victim Services of Central Florida. The Orientation Handbook discusses the Prison Rape Elimination Act, and calls and services. The Sexual Abuse Awareness pamphlet specifically refers to Victim Services of Central Florida, Inc. with the address, and to the Securus Network (8499 phone number). The auditors also observed posters throughout the facility. This information is maintained and documented.

Inmates are not detained solely for civil immigration services/purposes.

Based on the above agency procedures, the services offered as outlined in the agreement, based on documented information, and based on staff and inmate interviews, this standard is assessed as "meets standard".

## 115.54 Third-party reporting

**Auditor Overall Determination:** Exceeds Standard

### **Auditor Discussion**

The FDC and the CFRC provides a method to receive third-party reports of inmate sexual abuse or sexual harassment. Specifically the FDC, through the Office of Inspector General website, offers not only website information but a complaint form on the OIG website ([www.dc.state.fl.us/apps/igcomplaint.asp](http://www.dc.state.fl.us/apps/igcomplaint.asp)).

The website details the following: "Our top investigative priorities include investigations into: in custody deaths, public corruption and criminal efforts that compromise the safety and security of our prisons through violence, introductions/smuggling of contraband and sexual crimes/PREA (Prison Rape Elimination Act). This commitment to the prevention, detection and response of sexual abuse and sexual harassment was noted by the auditors throughout CFRC, its satellites and its policies and procedures. Moreover, the auditors noted, during its on-site visit and observation of operations, this staff's commitment to provide safety and security to the inmate population and the staff's commitment to compliance with the Prison Rape Elimination Act.

The auditors also reviewed the Florida Department of Corrections website which contains "Instructions - Filing a Grievance Alleging Sexual Abuse". The website indicated that third parties are allowed to file a grievance alleging sexual abuse on behalf of the inmate. The website also further indicated that you (the third party) may call the Bureau of Policy Management for instructions or questions.

Based on the above information that came from the websites, including the specific complaint form on the OIG website, and based on interviews with staff and inmates, the auditors assess this standard as "exceeds standard".

## 115.61 Staff and agency reporting duties

**Auditor Overall Determination:** Meets Standard

### **Auditor Discussion**

The FDC and CFRC through its Procedure 602.053, Prison Rape: Prevention, Detection, and Response complies with PREA law directing staff to immediately report and make notification to the shift supervisor any sexual abuse and sexual harassment, or information they receive regarding an incident of sexual abuse or sexual harassment that occurred in the facility. This procedure also requires all staff to report immediately any retaliation against inmates or staff who reported sexual abuse or sexual harassment. Procedure 602.053 is quoted as follows: "all instances or allegations of sexual abuse, sexual battery, staff sexual misconduct, and sexual harassment will be reported." It goes on to indicate that employees, volunteers, and contractors who observed or have knowledge of any sexual abuse or sexual harassment, will "immediately notify the Shift Supervisor, the Chief of Security, the Warden, or the Office of the Inspector General who will then take immediate steps to evaluate the inmates concern/allegation."

The reporting procedure is outlined in FDC Procedure 602.012, Emergency Action Center; Procedure in 602.008 Incident Report Procedure, and Procedure 108.007, Management Information Notification System. These procedures include directions concerning notifications, confidentiality of records, and the responsibility and duty of staff to report and to secure the safety, custody, care and control of the institution, staff and inmates at the facility.

All allegations of sexual abuse and sexual harassment are investigated, including third party and anonymous reports. Reporting is to the Emergency Action Center (EAC) and the Management Information Notification System (MINS).

The auditors wish to note the agency's commitment to reporting and complying with PREA law, to the extent outlined in this policy, quote, "any employee who fails to report and take immediate action regarding these incidents, or intentionally manifest actions to embarrass, demean, or humiliate any victim or informant, or trivializes a report of sexual abuse, sexual battery, staff sexual misconduct, or sexual harassment will be subject to discipline, up to and including termination." This is a strong statement and clearly emphasizes FDC's commitment to prevention, detection and response to sexual abuse.

Based on the above information, and interviews with staff, inmates, volunteers, contractors, investigative staff, and based on the observation of operations, including staff knowledge of duties and responsibilities, and training at CFRC, the auditors assess this standard as "meets standard"

## **115.62 Agency protection duties**

**Auditor Overall Determination:** Meets Standard

### **Auditor Discussion**

CFRC adheres to FDC Procedure 602.053, Prison Rape: Prevention, Detection, and Response. This procedure outlines the agency response and protection duties when it learns that an inmate is subject to a substantial risk of imminent sexual abuse. The procedure states "staff/security concerns will immediately be addressed by the Shift Supervisor.", Immediate steps are taken to evaluate the inmates concerns/allegations, to separate the alleged victim and abuser, including administrative confinement pursuant the provisions of the Administrative Confinement Rule 33-602.220. Determinations are made immediately and without unreasonable delay.

In the past 12 months, there have been zero (0) number of times the agency or facility determined that an inmate was subject to substantial risk of imminent sexual abuse. It was noted by the auditors that communications between staff and inmates at CFRC was observed as very good with staff, listening, as well as directing this reception population.

The auditors assess this standard as compliant based on their review of the procedures of the FDC, and interviews with staff and inmates at the facility and its satellites. This standard is assessed as "meets standard".

## **115.63 Reporting to other confinement facilities**

**Auditor Overall Determination:** Meets Standard

### **Auditor Discussion**

The FDC has a procedure requiring that upon receiving an allegation that an inmate was sexually abused while confined at another facility, the head of the facility must notify the head of the facility or appropriate office of the agency of the facility where the sexual abuse is alleged to have occurred. The PAQ indicates that in the past 12 months, the number of allegations the facility received that an inmate was abused while confined at another facility was zero (0). A further statement is made that "in the past 12 months, CFRC has not had an inmate alleged that they were abused while confined at another facility. Additionally, in the past 12 months, there has been one (1) allegation of sexual abuse the facility received from other facilities. It is noted that the facility that receives the allegation of sexual abuse must notify the Emergency Action Center for appropriate handling.

The supporting document is Procedure 602.053 Prison Rape: Prevention, Detection, and Response which states "if staff at a receiving institution receives information that sexual abuse, sexual battery, staff sexual misconduct, or sexual harassment occurred at another institution, the receiving institutions Warden shall notify the sending institutions Warden within seventy-two (72) hours of receiving the allegation. The notification shall be documented on a DC 6-210." Further, the receiving institution where the allegation is reported, is responsible for contacting EAC, and MINS for appropriate handling (see reporting 115.61 and 115.62).

Based on the FDC procedure, and the review of the procedure with the Warden, and the auditors review of the facility information and response, this standard is assessed as compliant, "meets standard."

## 115.64 Staff first responder duties

**Auditor Overall Determination:** Meets Standard

### **Auditor Discussion**

The FDC clearly outlines its First Responder duties for the agency and its facilities. Procedure 602.053 used throughout this series of standards addresses Official Response following an Inmate Report, and directs that the first security staff member is to respond as first responder. The security staff member will be required to, as quoted in the procedure:

- A) separate the alleged victim and abuser;
- B) preserve and protect any potential crime scene until appropriate steps can be taken to collect any evidence;
- C) if the alleged abuse occurred within a time period that allows for collection of physical evidence, ensure that the alleged abuser does not take any actions that could destroy physical evidence including but not limited to, washing, bathing, brushing teeth, changing clothes, urinating, defecating, drinking, or eating; and
- D) if the first responder is not a security staff member request that the alleged victim not take any action that could destroy physical evidence, and then notify security staff.

In the past 12 months, there have been 15 allegations that an inmate was sexually abused. In the past 12 months a security staff member responded 14 times to separate the alleged victim and abuser. In the past 12 months, the number of allegations, where a staff member was notified within a time period that allowed for the collection of physical evidence was three (3). In these three incidents, the staff member requested the victim not take any action to destroy physical evidence and ensured that the alleged abuser did not take any actions to destroy evidence, all according to policy. In the past 12 months there have been zero (0) number of times that an allegation of sexual abuse was made in which a non-security staff member was the first responder. This information obtained from the Pre-Audit Questionnaire, as well as from documentation of allegations and investigations reviewed during the on-site visit.

Especially impressive with the CFRC staff was their knowledge of first responder duties when formally interviewed by the auditors. Their responses were accurate, to the point, and demonstrated their knowledge of their duties and responsibilities. Training records were also reviewed by the auditors substantiating appropriate training, for first responder duties.

Based on the above policies and procedures and interviews with staff, the auditors assess this standard as compliant, "meets standard".

## **115.65 Coordinated response**

**Auditor Overall Determination:** Meets Standard

### **Auditor Discussion**

The written coordinated response for Central Florida Reception Center begins by stating "per PREA standard 115.65, please find below this facility's written plan to coordinate actions taken in response to an incident of sexual abuse."

Further, the plan outlines that upon learning of an allegation, and first responder duties are accomplished, a coordination of duties is initiated by the shift supervisor or the chief of security, including : timeline of the alleged incident; names of all persons, responding and record-keeping; notifications; evidence collection and chain of custody; EAC OIG, and MINS notifications; medical notifications and medical response; mental health notification; victim support notification; and Sexual Abuse Review Team (SART) notification as appropriate.

The PREA Coordinated Response Plan is documented, distributed and signed by the Warden. This plan was reviewed by the auditors.

Based on the auditors' review of the PREA Coordinated Response Plan and based on interviews with medical, mental health, security staff, the PREA Manager and the Warden, the auditors assess this standard as "meets standard".

## **115.66 Preservation of ability to protect inmates from contact with abusers**

**Auditor Overall Determination:** Meets Standard

### **Auditor Discussion**

The auditors reviewed the supporting documentation supplied by the FDC and CFRC concerning this standard, including the Teamsters Security Services Unit Agreement, dated 10/14/15 through 6/30/16; the PBA (Police Benevolent Association) Security Services Unit Agreement(s) dated 8/10/16 through 6/30/17 and 12/12/17 through 6/30/20. These agreements do not limit the agency's or the facility's ability to protect inmates from contact with abusers.

Based upon the auditors review of the agreements above, and based on the ability of the agency and facility to protect inmates from contact with abusers as verified by the Warden, the Agency PREA Coordinator, and the facility PREA Manager, the auditors assess this standard as compliant, "meets standard".

## **115.67 Agency protection against retaliation**

**Auditor Overall Determination:** Meets Standard

### **Auditor Discussion**

The FDC has a procedure to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff. The Procedure 602.053, Prison Rape: Prevention, Detection, and Response directs the following: "inmates and/or staff who report sexual abuse will be monitored for retaliation for at least ninety (90) days, with at least three (3) contact status checks to occur within the ninety (90) day monitoring at the thirty (30), sixty (60), and ninety (90) day marks from the date of the allegation." The procedure goes further to discuss and point out the treatment and changes that may occur to staff and inmates; including demeanor of staff and inmates; other areas to be observed and monitored during the review period, such as housing, job assignments, discipline, behavioral reports for inmates; and post assignments, shift changes, and performance reports, for staff. Monitoring can be continued beyond the minimum 90 days unless an allegation of retaliation is determined to be unfounded.

In the past 12 months, there has been a zero (0) number of times that an incident of retaliation has occurred. This information reported by the PAQ and confirmed by interviews with key staff.

The PREA Manager/Assistant Warden, Chief of Security are to monitor for retaliation concerning staff, and Classification Officers are to monitor retaliation concerning inmates.

The auditors, based on the review of the FDC procedures, and interviews with the Warden, the investigators, the Institutional PREA Manager, and staff and inmates, access this standard as compliant, "meets standard".

## **115.68 Post-allegation protective custody**

**Auditor Overall Determination:** Meets Standard

### **Auditor Discussion**

The FDC has Rules per the Florida Administrative Code (FAC) for administrative confinement, protective custody, and administrative segregation. Additionally, FDC Procedure 602.053 addresses post-allegation protective custody, and directs that an inmate may be placed in administrative confinement pursuant FAC rule 33-302.220. After placement, the Institutional Classification Team will review such in 72 hours. Alternative measures are reviewed and reasons for involuntary, if continued, are documented.

The auditors reviewed case files/inmate classification screens, including inmate classification logs and housing assignments, reports of administrative segregation assignments, and other information documenting the post-allegation protective custody or administrative segregation. The auditors were impressed with the individual treatment and assessment made by classification and security staff. The Institutional Classification Team (ICT) conducts reviews.

In the past 12 months, there have been six (6) inmates who allege to have suffered sexual abuse that were held in involuntary segregated housing for 1 to 24 hours. This confinement was based on a waiting completion of the assessment. In the past 12 months, there have been zero (0) number of inmates who allege to have suffered sexual abuse, who were assigned to involuntary housing for more than 30 days while awaiting an alternative placement. The auditors reviewed the case files and noted the appropriate documentation that included information and reasons to protect the inmate.

In the past 12 months, CFRC did not have an inmate in involuntary segregation past 30 days. It is noted that if such segregation is required, 30 day reviews are mandatory.

The auditors based on interviews with staff and inmates, and based on the rules of administrative confinement, and the operation and use of administrative confinement at CFRC assessed this standard as compliant, "meets standard".

## **115.71 Criminal and administrative agency investigations**

**Auditor Overall Determination:** Meets Standard

### **Auditor Discussion**

As outlined in the FDC Procedure 602.053, the FDC and CFRC have zero tolerance for sexual abuse and sexual harassment. Further, all allegations of sexual abuse and sexual harassment are reported to the OIG for investigative purposes.

The FDC also has two Procedures 108.003 Investigative Process, and 108.015 Sexual Battery, Sexual Harassment, and Sexual Misconduct Investigations that relate to criminal and administrative agency investigations. These procedures define the investigative process, inspector, and detail specific procedures and guidelines, including "for the investigation of sexual abuse, sexual battery, sexual misconduct, staff on inmate sexual harassment or voyeurism allegations within the Department of Corrections." The procedures also direct that the Office of the Inspector General be the primary investigative unit of all sexual battery allegations occurring on Department property and be the primary investigative unit of all sexual misconduct allegations occurring on Department property. Further, the procedures address incidents on institutional grounds; inspector responsibilities; sexual abuse/sexual harassment/voyeurism; reporting investigative findings to victims; administrative investigations; use of voice stress analysis or polygraphs; PREA survey forms; records retention; and specialized training.

Substantiated allegations of conduct that appear to be criminal are referred for prosecution. In this reporting period since the last PREA audit, there have been zero (0) number of substantiated allegations of conduct that appear to be criminal that were referred for prosecution.

The agency retains all written reports pertaining to investigations for as long as the abuser is incarcerated or employed by the agency plus 5 years.

Subsections (a) - (l) were noted and reviewed by the auditors with key staff and OIG Investigators, and assessed as compliant.

Based on the Florida Statutes referred to on the OIG website, the information on the OIG website; Procedures of the FDC referencing zero tolerance and investigations; the information in standards 115.21, 115.22, and 115.34; and based on interviews and discussions with OIG Investigators, the Agency PREA Coordinator, the Institutional PREA Manager, the Warden, and other key staff, the auditors assess this standard as compliant, "meets standard".

## **115.72 Evidentiary standard for administrative investigations**

**Auditor Overall Determination:** Meets Standard

### **Auditor Discussion**

FDC 108.003 Investigative Process, addresses the evidentiary standard for administrative investigations. This Procedure is the quoted defining a "Preponderance of Evidence, where used herein, refers to the greater weight of evidence, not necessarily established by the greater number of witnesses testifying to a fact, but by evidence that has the most convincing force; superior evidentiary weight that although not sufficient to free the mind wholly from all reasonable doubt, remains sufficient to incline a fair and impartial mind to one side of the issue rather than the other; evidence which indicates the behavior, action, or incident more likely occurred than did not."

This preponderance of the evidence is used for administrative investigations as outlined in the agency zero-tolerance policy and Procedure 602.053, Prison Rape: Prevention, Detection and Response.

Based on the FDC procedures, and interviews with OIG Investigators, institutional staff, including the Warden, the PREA Manager, and other key staff. The auditors assess this standard as compliant, "meets standard".

## 115.73 Reporting to inmates

**Auditor Overall Determination:** Meets Standard

### **Auditor Discussion**

FDC Procedure 602.053, Prison Rape: Prevention, Detection, and Response directs that the agency will conduct an administrative, security, investigation, if an allegation of sexual abuse is returned to the management from the Office of the Inspector General. Upon completion of this investigation, "The facility will also be responsible for notifying the inmate(s) regarding the outcome of the investigation via an 'Inmate Notification Administration Investigation Outcome,' DC6-2080." Notifications by this procedure, further indicates that if it is an allegation by staff (unless unfounded) notification to the inmate will be made whenever the staff member is no longer assigned to the facility or employed with the Department.

Notification to victims is also outlined in the Procedure 108.015 Sexual Battery, Sexual Harassment, and Sexual Misconduct Investigations. Specifically, the procedure directs "Reporting Investigative Finding to Victims; (c) the case Inspector shall notice any PREA victim inmate if an allegation against a staff member for sexual abuse, sexual battery, sexual misconduct, sexual harassment, or voyeurism (administrative or criminal) is exonerated, sustained, partially sustained, not sustained, unfounded, closed by arrest, exceptionally cleared, or placed in open-inactive status." Other provisions also outlined in the procedure referred to the fact that the inspector shall afford the victim the opportunity to review the report with stipulations. Also, the case inspector or supervisor shall notify any victim when the department learns that the alleged abuser has been indicted on a charge related to sexual abuse, or when the alleged abuser was convicted of a charge related to sexual abuse. Simply, notification is made to the inmate victim as required by PREA.

There were four (4) completed criminal and/or administrative investigations of alleged inmate sexual abuse at CFRC in the past 12 months. Of the alleged sexual abuse investigations that were completed (4), there were four (4) notifications to inmates, verbally or in writing, of the results of the investigation.

Based on the above information, and the auditors' review of procedures and documents, as well as interviews with staff and inmates, this standard is assessed as compliant, "meets standard".

## 115.76 Disciplinary sanctions for staff

**Auditor Overall Determination:** Exceeds Standard

### **Auditor Discussion**

The Florida State Statutes, the Florida Administrative Code, and the Florida Department of Corrections Procedures specifically address disciplinary actions for staff, including termination, for violating agency sexual abuse or sexual harassment policies.

Specifically, the following is detailed:

- 1) Chapter 944 of the Florida Statutes-State Correctional System, addresses employee conduct, including but not limited to the following areas; sexual misconduct prohibited; malicious battery; and penalties.
- 2) the Florida Administrative Code-section 60 L-36.005 addresses conduct of all employees in the State Personnel System, including but not limited to; negligence; inefficiency or inability to perform assigned duties; violations of laws; conduct unbecoming public employees; misconduct; conviction of any crime; and etc.
- 3) the Florida Administrative Code section 33-208.003 Range of Disciplinary Action, addresses the violation of the Rules of Conduct and addresses the offense or deficiency, as well as the first, second, third and fourth occurrence.
- 4) the FDC Procedure Employee Counseling and Discipline, 208.039 from the FDC Office of Human Resources, addresses specific procedures for employee discipline standards, roles and responsibilities, employee counseling, types of disciplinary action, and procedures for issuing discipline.

The auditors reviewed these procedures and policies.

In the past 12 months, there has been zero (0) number of staff from the facility who have violated agency sexual abuse or sexual harassment policies. In the past 12 months, there have been zero (0) number of staff who have been terminated for violating agency sexual abuse or sexual harassment policies. In the past 12 months, there have been zero (0) number of staff from the facility who have been disciplined, short of termination, for violation of sexual abuse or sexual harassment policies. In the past 12 months, there have been zero (0) number of staff from the facility that have been reported to law enforcement or licensing boards following their termination for violating agency sexual abuse or sexual harassment policies. This information provided by the facility through the Pre-Audit Questionnaire and discussed by the auditors with key staff.

The auditors have been especially impressed with the FDC's approach to employee conduct, insisting on "good moral behavior"; attention to laws, rules, and regulations; appropriate use of language towards inmates, visitors, and persons under supervision; and insisting on employee compliance with PREA and employees actions NOT to embarrass or demean any victim or informant, or trivialize any report of sexual abuse, sexual battery, staff sexual misconduct or sexual harassment. Simply, in the auditors' opinion, it is important in correctional systems that all staff, inmates, visitors, contractors, all follow the law, rules and regulations, and try to exhibit professional/exemplary behavior. CFRC and its satellites are making such efforts.

Based on the above information, and review of personnel and agency policies and procedures, and based on interviews with the Warden, investigative staff, and interviews with

random staff, the auditors assess this standard as, "exceeds standard".

## **115.77 Corrective action for contractors and volunteers**

**Auditor Overall Determination:** Meets Standard

### **Auditor Discussion**

Corrective action and discipline for contractors, volunteers, and interns is defined by the Florida Statutes, the Florida Administrative Code, and FDC Procedure (similar to the laws and regulations referred to in 115.76 above).

FDC Procedure 205.002, Contract Management, states, " A contract may be terminated for any of the following reasons: (a) termination at will... (c) termination for cause...4. The contractor fails to comply with the Department's PREA policies and procedures and/or Federal Rule 28 C. F. R. Part 115."

In the past 12 months there has been one (1) contractor who has been reported to a licensing board for inappropriate contact with an inmate. This case and the Termination of Contractor Report was reviewed by the audit team. Appropriate action and remedial measures were accomplished. No other instances of sexual abuse or sexual harassment were reported by CFRC. This information documented and detailed in the Pre-Audit Questionnaire.

Based on the information taken from the PAQ and supporting documents, and based on interviews with staff, volunteers, and contractors, this standard is assessed as compliant, "meets standard".

## 115.78 Disciplinary sanctions for inmates

**Auditor Overall Determination:** Meets Standard

### **Auditor Discussion**

Inmate rules, rules of prohibited conduct, discipline procedures, and disciplinary sanctions for inmates are governed by the Florida Statutes, Florida Administrative Code (FAC), and the FDC Procedures (including the CFRC Inmate Orientation Manual).

The FAC Chapter 33-601.301 Inmate Discipline-General Policy, Chapter 33-601.314 Rules of Prohibited Conduct and Penalties for Infractions, chapter 33-601.800 Close Management, and the Inmate Manual at CFRC outline and direct the code of conduct, behavior, and discipline at the facility. The general policy stipulates that the inmates will have access to the rules and that the goals and purposes of discipline and disciplinary intervention are designed to eliminate disciplinary violations. The goals and purpose of discipline are incorporated into the staff training program.

Procedure 602.053, Prison Rape: Prevention, Detection, and Response, states, "(a) Inmate(s) who have been found guilty of sexual abuse, sexual battery, or sexual harassment, through the course of either internal or external hearings will be processed in accordance with 'disciplinary confinement' Rule 33-602.222F, F.A.C.. unless otherwise ordered through judicial or administrative processes. (b) All inmates who have been found guilty....of sexual abuse or sexual battery will be referred for 'Close Management' 33-601.800 F.A.C....(c) When it is determined that an inmate has filed a PREA report in bad faith, i. e. knowingly filed a false report, that inmate shall be subject to discipline."

In the past 12 months, there have been zero (0) number of administrative findings of inmate-on-inmate sexual abuse that have occurred at the facility. In the past 12 months, there have been zero (0) findings of guilt for inmate-on-inmate sexual abuse that have occurred at the facility. This information provided by the PAQ and discussed by the auditors with key staff.

Based on the auditors' review of PREA documentation, agency's policies and procedures, observation of the operations at CFRC, and based on interviews with staff and inmates, the auditors assess this standard as compliant, "meets standard".

## 115.81 Medical and mental health screenings; history of sexual abuse

**Auditor Overall Determination:** Meets Standard

### **Auditor Discussion**

Central Florida Reception Center is a designated reception and intake facility accepting inmates from County jails, primarily in central Florida. These County Jail inmates are taken through the intake and orientation/reception process at CFRC and then generally transferred to an appropriate facility within the FDC.

FDC Procedures 601.209 Reception Process-Initial Classification and 602.053, Prison Rape: Prevention, Detection, and Response direct PREA compliance, including medical and mental health screenings; and history of sexual abuse. Procedures 601.209, directs "Health services staff will do an initial health screening of each inmate on the first day of her/his arrival into the Department." Procedures 602.053 is the foundation for PREA compliance and the agency's zero tolerance policy.

Healthcare screening in the reception process not only addresses medical and mental health care, but also addresses PREA issues including the Inmate Behavioral Assessment Scale (IBAS) and Sexual Risk Indicator (SRI). Prior to beginning the reception assessment, the Department, in order to comply with PREA and provide a safe and secure environment for inmates, asks 13 questions. These questions include description of sexual orientation or gender identity, sexual victimization, sexual abusiveness, previous incarceration, familiarity with prison environment, historical arrest circumstances, and other information outlined in the screening process of standard 115.41. Following this, the healthcare portion of these assessments begins with Health Services Intake and Reception Process Procedure 401.014, including medical grade/impairments reviewing special scoring parameters, and assessing/scoring the following:

1. Medical grade
2. Psychological grade
3. Work grade
4. Transportation grade
5. Impairment (including physical, hearing, eyes, psychiatric)
6. Wheelchair
7. Hearing-impaired.

All inmates at CFRC who have disclosed any prior sexual victimization during screening are offered a follow-up meeting with a medical or mental health practitioner. This directed by the agency's procedures 602.053. This occurs within 14 days, and in the past 12 months 100% of inmates who disclosed prior victimization during screening were offered a follow-up. This documented in the Pre-Audit Questionnaire and confirmed by medical and mental health staff. Additionally, inmates who have perpetrated sexual abuse as asked on the SRI scale are offered a follow-up meeting with a mental health practitioner, however, in the past 12 months, there have been zero (0) number of inmates who have acknowledged abusiveness. Further, in the past 12 months, there have been zero (0) number of criminal findings of guilt for inmate on inmate sexual abuse that occurred at CFRC. This detailed in the PAQ and discussed with mental health staff.

Information related to sexual victimization or abusiveness is appropriately limited and can only be accessed on inmate classification screenings and records by access codes and passwords. Staff to staff information is also strictly limited as directed by procedures 602.053 (to make housing, work program, or other inmate assignments, etc.) medical and mental health practitioners also appropriately obtained informed consent from inmates with an agency consent form.

The auditors reviewed the IBAS and SRI scales and systems which have been designed to identify risk factors and believe that the CFRC is assisting victims (and abusers) and addressing the prevention, detection, and response to sexual abuse and sexual harassment in prison.

Based on the medical and mental health care provisions of the policies and procedures above, and based on interviews with specialized health care staff, and random staff and inmates, this standard is assessed as compliant by the auditors, "meets standard".

## **115.82 Access to emergency medical and mental health services**

**Auditor Overall Determination:** Meets Standard

### **Auditor Discussion**

Inmates at CFRC, including inmate victims of sexual abuse, receive timely unimpeded access to emergency medical treatment and crisis intervention services. FDC Procedure 602.053, Prison Rape: Prevention, Detection, and Response; specifically states "Alleged inmate victims of sexual abuse, sexual battery, or staff sexual misconduct shall receive timely, unimpeded access to emergency treatment and crisis intervention services, the nature and scope of which will be determined by medical and mental health practitioners according to their professional judgment." The procedure for those further indicate that "Treatment services shall be provided to the victim without financial cost."

In addition to FDC Procedures indicating access to health care, each inmate, upon admission to CFRC receives a FDC Sexual Abuse Awareness pamphlet. This pamphlet indicates that if you are sexually assaulted "Request immediate medical attention. You may have serious injuries that you are not aware of, and any sexual contact can expose you to sexually transmitted diseases." Further, in the pamphlet, the inmate is advised to "Seek professional help. Medical staff is available for crisis care, and advocacy services are available as well."

Formal and informal interviews were conducted with health care staff and the question was asked by the auditors if they considered the level of care comparable to the community level of care? Without exception, answers to that question indicated that the level of care was as good as or better than the community level of care. Centurion Incorporated is the medical care provider for CFRC and the Florida Department of Corrections. Their training program, as outlined in standard of 115.35, is comprehensive and helps ensure appropriate medical and mental health care to the inmates. The auditors also reviewed documents that supported the medical and mental health care requirement that secondary materials were completed and maintained documenting the timeliness of emergency medical treatment and crisis intervention services. The review included Department forms; DC 4-683M, DC 4-708, DC 4-529, and DC 4-642B.

Based on the auditors' review of the above-mentioned procedures, documentation, and interviews with staff and inmates concerning access to emergency medical and mental health services, this standard is assessed as compliant, "meets standard".

## **115.83 Ongoing medical and mental health care for sexual abuse victims and abusers**

**Auditor Overall Determination:** Meets Standard

### **Auditor Discussion**

CFRC offers medical and mental health evaluation and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility..

The auditors reviewed FDC Procedure 602.053 Prison Rape: Prevention, Detection and Response; FDC Procedure 401.010 Co-Payment Requirements for Inmate Medical Encounter; and Health Services Bulletin 15.03.36 Post Sexual Battery Medical Action. These procedures and policies direct and supplement Centurion's healthcare action as well as supporting PREA compliance for subsections, a through h of this standard. CFRC is a reception facility and has appropriate staff for movement and transfers. Referrals can be accommodated.

CFRC is an all-male inmate facility, female victims, and pregnancy issues are non-applicable. The two satellite centers that house female inmates, meet the requirements of standard 115.83 subsections (d and e) regarding pregnancy testing and lawful pregnancy treatment/care for victims of sexual abuse.

Inmate victims of sexual abuse, while incarcerated, are offered tests for sexually transmitted infections as medically appropriate. Additionally, the Mental Health Services Department attempts to conduct a mental health evaluation of all known inmate on inmate abusers within 60 days of learning of such history. This detailed in the Procedure 602.053.

Based on interviews with specialized medical staff, and mental health staff, key staff at the facility, random inmates, and based on the review of the above procedures, documentation, and medical records, the auditors assess this standard as compliant, "meets standard".

## 115.86 Sexual abuse incident reviews

**Auditor Overall Determination:** Meets Standard

### **Auditor Discussion**

Central Florida Reception Center in accordance with the FDC procedure 602.053 Prison Rape: Prevention, Detection and Response has established a Sexual Abuse Incident Review Committee (SAIRC) that is responsible for reviewing sexual abuse incidents at the facility. The CFRC PREA Manager who is also the Assistant Warden chairs the committee.

Procedure 602.053 documents, and is quoted as follows: "(13) Sexual Abuse/Battery Review: The institution shall conduct a sexual abuse or sexual battery incident review within thirty (30) days of the conclusion of the investigation by completing the 'Sexual Abuse Incident Reviews/Facility Investigation Summary,' DC6-2076. This review team shall consist of the Assistant Warden, Chief of Security, and Classification Supervisor. The team will also obtain input via reports from line supervisors, investigators, and medical or mental health practitioners. The SAIRC is not responsible for conducting a review of any allegation that is unfounded. The SAIRC shall meet to, at a minimum:

- (a) assess the adequacy of staffing levels in the area where the incident happened.
- (b) consider whether the incident/allegation was motivated by race, ethnicity, LGBTI identification, gang affiliation, or other group dynamics of the institution.
- (c) examine the area that the incident allegedly occurred to assess whether physical barriers or obstructions in the area may have enabled abuse.
- (d) assess whether monitoring technology should be deployed or augmented to supplement supervision by staff; and
- (e) on a monthly basis, prepare a report with recommendations for improvements, and submit to the PREA Coordinator".

In the past 12 months, there have been four (4) number of criminal and/or administrative investigations of alleged sexual abuse completed by the facility, excluding only unfounded incidents. These four investigations have been reviewed within 30 days by the SAIRC. The auditors have also reviewed the investigations and the incident review committee's reports. These reports are PREA compliant and addressed the issues listed in standard 115.86.

Based on the auditors' review of policy and procedure, and based on the SAIRC reports, and also based on interviews with committee members, and the Warden, the standard is assessed as compliant, "meets standard".

## **115.87 Data collection**

**Auditor Overall Determination:** Meets Standard

### **Auditor Discussion**

To establish a foundation for this section on data collection and review, the auditors went to the Florida Department of Corrections (FDC) website to review annual reports of the FDC and the Survey of Sexual Victimization (SSV-IA) submitted to the US Department of Justice.

The CFRC and the FDC collect accurate, uniform data for every allegation of sexual abuse. The CFRC PREA Manager submits monthly reports to the Agency PREA Coordinator. Procedure 602.053 Prison Rape: Prevention, Detection, and Response, directs and outlines data collection and analysis. The Procedure directs that the PREA Coordinator is to be responsible for the compilation of the information required by the Federal Bureau of Justice Statistics and the reporting of data related to PREA incidents in the FDC. This includes the forms SSV-1A Sexual Victimization-Incident Form, and form SSV-2 Sexual Victimization-State Prison Systems Summary Form.

The FDC also addresses the following: 1) It aggregates the incident-based sexual abuse data annually; it maintains, reviews, and collects data from all available incident-based documents; its private facilities-based and aggregated data, and these private facilities comply with the SSV forms.

Based on the auditors' review of the SSV forms; the facility annual report and the FDC Annual Report; the monthly reports of the facility; and based on the interviews with the FDC PREA Coordinator, and the facility PREA Manager, this standard is assessed as compliant, "meets standard".

## **115.88 Data review for corrective action**

**Auditor Overall Determination:** Meets Standard

### **Auditor Discussion**

The Florida Department of Corrections reviews the data collected and aggregated, pursuant to the previous standard, 115.87, in order to assess and improve the effectiveness of its sexual abuse prevention, detection and response policies and procedures, training, etc. The Department of Corrections Prison Rape Elimination Act Corrective Action Plan and the Survey of Sexual Victimization (SSV forms) are the foundations and basics of the agency reviews of this collected and aggregated data.

The Corrective Action Plan of the FDC indicates four main bullets:

" Continue to work with the Legislature in order to secure funding necessary to hire staff to fulfill the Departments current staffing plan.

Develop a scope of work and resource need to be considered by the agency for a Legislative Budget Request to install cameras and recording systems in high-traffic areas, and locations where inmates congregate in work and leisure.

Consider the submittal of a legislative budget to fund additional FTE's to establish additional Inspectors in the Office of the Inspector General, to address and investigate reportable PREA allegations in a more prompt and efficient manner.

Continue to provide advanced training of staff on PREA definitions and reportable PREA incidents."

This corrective action plan was signed off by the Secretary of the Florida Department of Corrections. The plan was reviewed by the PREA auditors and supports compliance with this standard.

SSV forms were also reviewed by the auditors along with the aggregated PREA sexual abuse allegations, sexual harassment allegations, inmate on inmate abuse, and staff misconduct. It is noted that the Department has experienced a decrease in reported PREA allegations. "The Department attributes this decrease to policy changes as well as the staff training programs completed by the PREA office."

Based on the auditors' review of the agency website, the Department of Corrections PREA Corrective Action Plan, the CFRC's Corrective Action Plan, and based on interviews with the Secretary of the FDC, the Agency PREA Coordinator, the Institutional Warden and the Institutional PREA Manager, the auditors assess this standard as compliant, "meets standard".

## **115.89 Data storage, publication, and destruction**

**Auditor Overall Determination:** Meets Standard

### **Auditor Discussion**

The auditors reviewed data storage, publication, and destruction issues pursuant PREA standard 115.89. The FDC ensures that incident-based and aggregated data are securely retained. This is outlined in the FDC Procedure 602.053, Prison Rape: Prevention, Detection, and Response. The policy indicates that investigation records and PREA related records shall be retained by the agency for ten (10) years after the date of the initial collection of the documentation and records or for the incarceration of the victim or employment of the subject or suspect, plus five (5) years. The policy also indicates that institutional compliance managers are responsible for uploading all related documents to the facility's electronic retention file once a PREA case is completed.

The FDC website was also reviewed by the auditors and it is noted that the aggregated sexual abuse data from facilities and private facilities is made available to the public, at least annually.

Based on the auditors' interviews with the Secretary of the Florida Department of Corrections, the Agency PREA Coordinator, and based on the policies and procedures of the FDC, the auditors assess this standard as compliant, "meets standard".

## **115.401 Frequency and scope of audits**

**Auditor Overall Determination:** Meets Standard

### **Auditor Discussion**

The auditors reviewed subsections a, b, c, h, l, m, n, with key staff, and reviewed the FDC agency website. Based on these reviews, and based on the accessibility of all areas of the institution to the auditor, and based on the auditors' access to inmates and the inmates access to the auditors, the auditor assesses this standard as compliant, "meets standard".

It should be noted that the auditor discussed with the Agency PREA Coordinator, and Central Office PREA staff, the subsections a and b, of this standard, which were discussed with the PREA Resource Center. This discussion related to, and supported the auditors' assessment of compliance for this standard. It is also noted that the auditors reviewed the previous CFRC 2015 PREA audit which was on the agency's website.

## **115.403 Audit contents and findings**

**Auditor Overall Determination:** Meets Standard

### **Auditor Discussion**

The auditors have reviewed the FDC agency website, and the lead auditor has interviewed both the Secretary of the Florida Department of Corrections and the Agency PREA Coordinator. This standard has been discussed with the agency's PREA office on several occasions. Based on these formal interviews and discussions, and based on the review of the website that contains the previous published audit report for Central Florida Reception Center and finding that this audit is part of the second cycle of audits, the auditors assesses this standard as "meets standard".

## Appendix: Provision Findings

### 115.11 (a) Zero tolerance of sexual abuse and sexual harassment; PREA coordinator

Does the agency have a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment? yes

Does the written policy outline the agency's approach to preventing, detecting, and responding to sexual abuse and sexual harassment? yes

### 115.11 (b) Zero tolerance of sexual abuse and sexual harassment; PREA coordinator

Has the agency employed or designated an agency-wide PREA Coordinator? yes

Is the PREA Coordinator position in the upper-level of the agency hierarchy? yes

Does the PREA Coordinator have sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards in all of its facilities? yes

### 115.11 (c) Zero tolerance of sexual abuse and sexual harassment; PREA coordinator

If this agency operates more than one facility, has each facility designated a PREA compliance manager? (N/A if agency operates only one facility.) yes

Does the PREA compliance manager have sufficient time and authority to coordinate the facility's efforts to comply with the PREA standards? (N/A if agency operates only one facility.) yes

### 115.12 (a) Contracting with other entities for the confinement of inmates

If this agency is public and it contracts for the confinement of its inmates with private agencies or other entities including other government agencies, has the agency included the entity's obligation to comply with the PREA standards in any new contract or contract renewal signed on or after August 20, 2012? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates.) yes

**115.12 (b) Contracting with other entities for the confinement of inmates**

Does any new contract or contract renewal signed on or after August 20, 2012 provide for agency contract monitoring to ensure that the contractor is complying with the PREA standards? (N/A if the agency does not contract with private agencies or other entities for the confinement of inmates OR the response to 115.12(a)-1 is "NO".) yes

**115.13 (a) Supervision and monitoring**

Does the agency ensure that each facility has developed a staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect inmates against sexual abuse? yes

Does the agency ensure that each facility has documented a staffing plan that provides for adequate levels of staffing and, where applicable, video monitoring, to protect inmates against sexual abuse? yes

Does the agency ensure that each facility's staffing plan takes into consideration the generally accepted detention and correctional practices in calculating adequate staffing levels and determining the need for video monitoring? yes

Does the agency ensure that each facility's staffing plan takes into consideration any judicial findings of inadequacy in calculating adequate staffing levels and determining the need for video monitoring? yes

Does the agency ensure that each facility's staffing plan takes into consideration any findings of inadequacy from Federal investigative agencies in calculating adequate staffing levels and determining the need for video monitoring? yes

Does the agency ensure that each facility's staffing plan takes into consideration any findings of inadequacy from internal or external oversight bodies in calculating adequate staffing levels and determining the need for video monitoring? yes

Does the agency ensure that each facility's staffing plan takes into consideration all components of the facility's physical plant (including "blind-spots" or areas where staff or inmates may be isolated) in calculating adequate staffing levels and determining the need for video monitoring? yes

Does the agency ensure that each facility's staffing plan takes into consideration the composition of the inmate population in calculating adequate staffing levels and determining the need for video monitoring? yes

Does the agency ensure that each facility's staffing plan takes into yes

consideration the number and placement of supervisory staff in calculating adequate staffing levels and determining the need for video monitoring?

Does the agency ensure that each facility's staffing plan takes into consideration the institution programs occurring on a particular shift in calculating adequate staffing levels and determining the need for video monitoring? yes

Does the agency ensure that each facility's staffing plan takes into consideration any applicable State or local laws, regulations, or standards in calculating adequate staffing levels and determining the need for video monitoring? yes

Does the agency ensure that each facility's staffing plan takes into consideration the prevalence of substantiated and unsubstantiated incidents of sexual abuse in calculating adequate staffing levels and determining the need for video monitoring? yes

Does the agency ensure that each facility's staffing plan takes into consideration any other relevant factors in calculating adequate staffing levels and determining the need for video monitoring ? yes

**115.13 (b) Supervision and monitoring**

In circumstances where the staffing plan is not complied with, does the facility document and justify all deviations from the plan? (N/A if no deviations from staffing plan.) yes

**115.13 (c) Supervision and monitoring**

In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The staffing plan established pursuant to paragraph (a) of this section? yes

In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The facility's deployment of video monitoring systems and other monitoring technologies? yes

In the past 12 months, has the facility, in consultation with the agency PREA Coordinator, assessed, determined, and documented whether adjustments are needed to: The resources the facility has available to commit to ensure adherence to the staffing plan? yes

**115.13 (d) Supervision and monitoring**

Has the facility/agency implemented a policy and practice of having intermediate-level or higher-level supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment? yes

Is this policy and practice implemented for night shifts as well as day shifts? yes

Does the facility/agency have a policy prohibiting staff from alerting other staff members that these supervisory rounds are occurring, unless such announcement is related to the legitimate operational functions of the facility? yes

**115.14 (a) Youthful inmates**

Does the facility place all youthful inmates in housing units that separate them from sight, sound, and physical contact with any adult inmates through use of a shared dayroom or other common space, shower area, or sleeping quarters? (N/A if facility does not have youthful inmates (inmates <18 years old).) na

**115.14 (b) Youthful inmates**

In areas outside of housing units does the agency maintain sight and sound separation between youthful inmates and adult inmates? (N/A if facility does not have youthful inmates (inmates <18 years old).) na

In areas outside of housing units does the agency provide direct staff supervision when youthful inmates and adult inmates have sight, sound, or physical contact? (N/A if facility does not have youthful inmates (inmates <18 years old).) na

**115.14 (c) Youthful inmates**

Does the agency make its best efforts to avoid placing youthful inmates in isolation to comply with this provision? (N/A if facility does not have youthful inmates (inmates <18 years old).) na

Does the agency, while complying with this provision, allow youthful inmates daily large-muscle exercise and legally required special education services, except in exigent circumstances? (N/A if facility does not have youthful inmates (inmates <18 years old).) na

Do youthful inmates have access to other programs and work opportunities to the extent possible? (N/A if facility does not have youthful inmates (inmates <18 years old).) na

**115.15 (a) Limits to cross-gender viewing and searches**

Does the facility always refrain from conducting any cross-gender strip or cross-gender visual body cavity searches, except in exigent circumstances or by medical practitioners? yes

**115.15 (b) Limits to cross-gender viewing and searches**

Does the facility always refrain from conducting cross-gender pat-down searches of female inmates in non-exigent circumstances? (N/A here for facilities with less than 50 inmates before August 20,2017.) yes

Does the facility always refrain from restricting female inmates' access to regularly available programming or other out-of-cell opportunities in order to comply with this provision? (N/A here for facilities with less than 50 inmates before August 20,2017.) yes

**115.15 (c) Limits to cross-gender viewing and searches**

Does the facility document all cross-gender strip searches and cross-gender visual body cavity searches? yes

Does the facility document all cross-gender pat-down searches of female inmates? yes

**115.15 (d) Limits to cross-gender viewing and searches**

Does the facility implement a policy and practice that enables inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks? yes

Does the facility require staff of the opposite gender to announce their presence when entering an inmate housing unit? yes

**115.15 (e) Limits to cross-gender viewing and searches**

Does the facility always refrain from searching or physically examining transgender or intersex inmates for the sole purpose of determining the inmate's genital status? yes

If an inmate's genital status is unknown, does the facility determine genital status during conversations with the inmate, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner? yes

**115.15 (f) Limits to cross-gender viewing and searches**

Does the facility/agency train security staff in how to conduct cross-gender pat down searches in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs? yes

Does the facility/agency train security staff in how to conduct searches of transgender and intersex inmates in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs? yes

**115.16 (a) Inmates with disabilities and inmates who are limited English proficient**

Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who are deaf or hard of hearing? yes

Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all

aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who are blind or have low vision?

Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who have intellectual disabilities? yes

Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who have psychiatric disabilities? yes

Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: inmates who have speech disabilities? yes

Does the agency take appropriate steps to ensure that inmates with disabilities have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including: Other (if "other," please explain in overall determination notes.) yes

Do such steps include, when necessary, ensuring effective communication with inmates who are deaf or hard of hearing? yes

Do such steps include, when necessary, providing access to interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary? yes

Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: Have intellectual disabilities? yes

Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: Have limited reading skills? yes

Does the agency ensure that written materials are provided in formats or through methods that ensure effective communication with inmates with disabilities including inmates who: are blind or have low vision? yes

**115.16 (b) Inmates with disabilities and inmates who are limited English proficient**

Does the agency take reasonable steps to ensure meaningful access to all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment to inmates who are limited English proficient?      yes

Do these steps include providing interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary?      yes

**115.16 (c) Inmates with disabilities and inmates who are limited English proficient**

Does the agency always refrain from relying on inmate interpreters, inmate readers, or other types of inmate assistance except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the inmate's safety, the performance of first-response duties under §115.64, or the investigation of the inmate's allegations?      yes

**115.17 (a) Hiring and promotion decisions**

Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)? yes

Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse? yes

Does the agency prohibit the hiring or promotion of anyone who may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above? yes

Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997)? yes

Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse? yes

Does the agency prohibit the enlistment of services of any contractor who may have contact with inmates who has been civilly or administratively adjudicated to have engaged in the activity described in the two bullets immediately above? yes

**115.17 (b) Hiring and promotion decisions**

Does the agency consider any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with inmates? yes

**115.17 (c) Hiring and promotion decisions**

Before hiring new employees who may have contact with inmates, does the agency: perform a criminal background records check? yes

Before hiring new employees who may have contact with inmates, does the agency: consistent with Federal, State, and local law, make its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse? yes

**115.17 (d) Hiring and promotion decisions**

Does the agency perform a criminal background records check before enlisting the services of any contractor who may have contact with inmates? yes

**115.17 (e) Hiring and promotion decisions**

Does the agency either conduct criminal background records checks at least every five years of current employees and contractors who may have contact with inmates or have in place a system for otherwise capturing such information for current employees? yes

**115.17 (f) Hiring and promotion decisions**

Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in written applications or interviews for hiring or promotions? yes

Does the agency ask all applicants and employees who may have contact with inmates directly about previous misconduct described in paragraph (a) of this section in any interviews or written self-evaluations conducted as part of reviews of current employees? yes

Does the agency impose upon employees a continuing affirmative duty to disclose any such misconduct? yes

- 115.17 (g) Hiring and promotion decisions**
- Does the agency consider material omissions regarding such misconduct, or the provision of materially false information, grounds for termination? yes
- 115.17 (h) Hiring and promotion decisions**
- Does the agency provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work? (N/A if providing information on substantiated allegations of sexual abuse or sexual harassment involving a former employee is prohibited by law.) yes
- 115.18 (a) Upgrades to facilities and technologies**
- If the agency designed or acquired any new facility or planned any substantial expansion or modification of existing facilities, did the agency consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not acquired a new facility or made a substantial expansion to existing facilities since August 20, 2012, or since the last PREA audit, whichever is later.) na
- 115.18 (b) Upgrades to facilities and technologies**
- If the agency installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology, did the agency consider how such technology may enhance the agency's ability to protect inmates from sexual abuse? (N/A if agency/facility has not installed or updated a video monitoring system, electronic surveillance system, or other monitoring technology since August 20, 2012, or since the last PREA audit, whichever is later.) yes

**115.21 (a) Evidence protocol and forensic medical examinations**

If the agency is responsible for investigating allegations of sexual abuse, does the agency follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.) yes

**115.21 (b) Evidence protocol and forensic medical examinations**

Is this protocol developmentally appropriate for youth where applicable? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.) yes

Is this protocol, as appropriate, adapted from or otherwise based on the most recent edition of the U.S. Department of Justice’s Office on Violence Against Women publication, “A National Protocol for Sexual Assault Medical Forensic Examinations, Adults/Adolescents,” or similarly comprehensive and authoritative protocols developed after 2011? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations.) yes

**115.21 (c) Evidence protocol and forensic medical examinations**

Does the agency offer all victims of sexual abuse access to forensic medical examinations, whether on-site or at an outside facility, without financial cost, where evidentiarily or medically appropriate? yes

Are such examinations performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible? yes

If SAFEs or SANEs cannot be made available, is the examination performed by other qualified medical practitioners (they must have been specifically trained to conduct sexual assault forensic exams)? yes

Has the agency documented its efforts to provide SAFEs or SANEs? yes

<b>115.21 (d)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	Does the agency attempt to make available to the victim a victim advocate from a rape crisis center?	yes
	If a rape crisis center is not available to provide victim advocate services, does the agency make available to provide these services a qualified staff member from a community-based organization, or a qualified agency staff member?	yes
	Has the agency documented its efforts to secure services from rape crisis centers?	yes
<b>115.21 (e)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	As requested by the victim, does the victim advocate, qualified agency staff member, or qualified community-based organization staff member accompany and support the victim through the forensic medical examination process and investigatory interviews?	yes
	As requested by the victim, does this person provide emotional support, crisis intervention, information, and referrals?	yes
<b>115.21 (f)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	If the agency itself is not responsible for investigating allegations of sexual abuse, has the agency requested that the investigating entity follow the requirements of paragraphs (a) through (e) of this section? (N/A if the agency/facility is responsible for conducting criminal AND administrative sexual abuse investigations.)	na
<b>115.21 (h)</b>	<b>Evidence protocol and forensic medical examinations</b>	
	If the agency uses a qualified agency staff member or a qualified community-based staff member for the purposes of this section, has the individual been screened for appropriateness to serve in this role and received education concerning sexual assault and forensic examination issues in general? (N/A if agency attempts to make a victim advocate from a rape crisis center available to victims per 115.21(d) above.)	yes

<b>115.22 (a)</b>	<b>Policies to ensure referrals of allegations for investigations</b>	
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual abuse?	yes
	Does the agency ensure an administrative or criminal investigation is completed for all allegations of sexual harassment?	yes
<b>115.22 (b)</b>	<b>Policies to ensure referrals of allegations for investigations</b>	
	Does the agency have a policy and practice in place to ensure that allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior?	yes
	Has the agency published such policy on its website or, if it does not have one, made the policy available through other means?	yes
	Does the agency document all such referrals?	yes
<b>115.22 (c)</b>	<b>Policies to ensure referrals of allegations for investigations</b>	
	If a separate entity is responsible for conducting criminal investigations, does such publication describe the responsibilities of both the agency and the investigating entity? (N/A if the agency/facility is responsible for criminal investigations. See 115.21(a).)	yes

**115.31 (a) Employee training**

Does the agency train all employees who may have contact with inmates on its zero-tolerance policy for sexual abuse and sexual harassment?	yes
Does the agency train all employees who may have contact with inmates on how to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures?	yes
Does the agency train all employees who may have contact with inmates on inmates' right to be free from sexual abuse and sexual harassment?	yes
Does the agency train all employees who may have contact with inmates on the right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment?	yes
Does the agency train all employees who may have contact with inmates on the dynamics of sexual abuse and sexual harassment in confinement?	yes
Does the agency train all employees who may have contact with inmates on the common reactions of sexual abuse and sexual harassment victims?	yes
Does the agency train all employees who may have contact with inmates on how to detect and respond to signs of threatened and actual sexual abuse?	yes
Does the agency train all employees who may have contact with inmates on how to avoid inappropriate relationships with inmates?	yes
Does the agency train all employees who may have contact with inmates on how to communicate effectively and professionally with inmates, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates?	yes
Does the agency train all employees who may have contact with inmates on how to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities?	yes

<b>115.31 (b)</b>	<b>Employee training</b>	
	Is such training tailored to the gender of the inmates at the employee's facility?	yes
	Have employees received additional training if reassigned from a facility that houses only male inmates to a facility that houses only female inmates, or vice versa?	yes
<b>115.31 (c)</b>	<b>Employee training</b>	
	Have all current employees who may have contact with inmates received such training?	yes
	Does the agency provide each employee with refresher training every two years to ensure that all employees know the agency's current sexual abuse and sexual harassment policies and procedures?	yes
	In years in which an employee does not receive refresher training, does the agency provide refresher information on current sexual abuse and sexual harassment policies?	yes
<b>115.31 (d)</b>	<b>Employee training</b>	
	Does the agency document, through employee signature or electronic verification, that employees understand the training they have received?	yes
<b>115.32 (a)</b>	<b>Volunteer and contractor training</b>	
	Has the agency ensured that all volunteers and contractors who have contact with inmates have been trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures?	yes
<b>115.32 (b)</b>	<b>Volunteer and contractor training</b>	
	Have all volunteers and contractors who have contact with inmates been notified of the agency's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents (the level and type of training provided to volunteers and contractors shall be based on the services they provide and level of contact they have with inmates)?	yes

<b>115.32 (c)</b>	<b>Volunteer and contractor training</b>	Does the agency maintain documentation confirming that volunteers and contractors understand the training they have received?	yes
<b>115.33 (a)</b>	<b>Inmate education</b>	During intake, do inmates receive information explaining the agency's zero-tolerance policy regarding sexual abuse and sexual harassment?	yes
		During intake, do inmates receive information explaining how to report incidents or suspicions of sexual abuse or sexual harassment?	yes
<b>115.33 (b)</b>	<b>Inmate education</b>	Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from sexual abuse and sexual harassment?	yes
		Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Their rights to be free from retaliation for reporting such incidents?	yes
		Within 30 days of intake, does the agency provide comprehensive education to inmates either in person or through video regarding: Agency policies and procedures for responding to such incidents?	yes
<b>115.33 (c)</b>	<b>Inmate education</b>	Have all inmates received such education?	yes
		Do inmates receive education upon transfer to a different facility to the extent that the policies and procedures of the inmate's new facility differ from those of the previous facility?	yes

<b>115.33 (d)</b>	<b>Inmate education</b>	
	Does the agency provide inmate education in formats accessible to all inmates including those who are limited English proficient?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are deaf?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are visually impaired?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who are otherwise disabled?	yes
	Does the agency provide inmate education in formats accessible to all inmates including those who have limited reading skills?	yes

<b>115.33 (e)</b>	<b>Inmate education</b>	
	Does the agency maintain documentation of inmate participation in these education sessions?	yes

<b>115.33 (f)</b>	<b>Inmate education</b>	
	In addition to providing such education, does the agency ensure that key information is continuously and readily available or visible to inmates through posters, inmate handbooks, or other written formats?	yes

<b>115.34 (a)</b>	<b>Specialized training: Investigations</b>	
	In addition to the general training provided to all employees pursuant to §115.31, does the agency ensure that, to the extent the agency itself conducts sexual abuse investigations, its investigators have received training in conducting such investigations in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).)	yes

**115.34 (b) Specialized training: Investigations**

Does this specialized training include techniques for interviewing sexual abuse victims? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).) yes

Does this specialized training include proper use of Miranda and Garrity warnings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).) yes

Does this specialized training include sexual abuse evidence collection in confinement settings? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).) yes

Does this specialized training include the criteria and evidence required to substantiate a case for administrative action or prosecution referral? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).) yes

**115.34 (c) Specialized training: Investigations**

Does the agency maintain documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations? (N/A if the agency does not conduct any form of administrative or criminal sexual abuse investigations. See 115.21(a).) yes

**115.35 (a) Specialized training: Medical and mental health care**

Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to detect and assess signs of sexual abuse and sexual harassment? yes

Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to preserve physical evidence of sexual abuse? yes

Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to respond effectively and professionally to victims of sexual abuse and sexual harassment? yes

Does the agency ensure that all full- and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how and to whom to report allegations or suspicions of sexual abuse and sexual harassment? yes

<b>115.35 (b)</b>	<b>Specialized training: Medical and mental health care</b>	
	If medical staff employed by the agency conduct forensic examinations, do such medical staff receive appropriate training to conduct such examinations? (N/A if agency medical staff at the facility do not conduct forensic exams.)	na
<b>115.35 (c)</b>	<b>Specialized training: Medical and mental health care</b>	
	Does the agency maintain documentation that medical and mental health practitioners have received the training referenced in this standard either from the agency or elsewhere?	yes
<b>115.35 (d)</b>	<b>Specialized training: Medical and mental health care</b>	
	Do medical and mental health care practitioners employed by the agency also receive training mandated for employees by §115.31?	yes
	Do medical and mental health care practitioners contracted by and volunteering for the agency also receive training mandated for contractors and volunteers by §115.32?	yes
<b>115.41 (a)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Are all inmates assessed during an intake screening for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
	Are all inmates assessed upon transfer to another facility for their risk of being sexually abused by other inmates or sexually abusive toward other inmates?	yes
<b>115.41 (b)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	Do intake screenings ordinarily take place within 72 hours of arrival at the facility?	yes

**115.41 (c) Screening for risk of victimization and abusiveness**

Are all PREA screening assessments conducted using an objective screening instrument? yes

**115.41 (d) Screening for risk of victimization and abusiveness**

Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (1) Whether the inmate has a mental, physical, or developmental disability?	yes
Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (2) The age of the inmate?	yes
Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (3) The physical build of the inmate?	yes
Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (4) Whether the inmate has previously been incarcerated?	yes
Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (5) Whether the inmate's criminal history is exclusively nonviolent?	yes
Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (6) Whether the inmate has prior convictions for sex offenses against an adult or child?	yes
Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (7) Whether the inmate is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming (the facility affirmatively asks the inmate about his/her sexual orientation and gender identity AND makes a subjective determination based on the screener's perception whether the inmate is gender non-conforming or otherwise may be perceived to be LGBTI)?	yes
Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (8) Whether the inmate has previously experienced sexual victimization?	yes
Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (9) The inmate's own perception of vulnerability?	yes
Does the intake screening consider, at a minimum, the following criteria to assess inmates for risk of sexual victimization: (10) Whether the inmate is detained solely for civil immigration purposes?	yes

<b>115.41 (e)</b>	<b>Screening for risk of victimization and abusiveness</b>	
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, when known to the agency: prior acts of sexual abuse?	yes
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, when known to the agency: prior convictions for violent offenses?	yes
	In assessing inmates for risk of being sexually abusive, does the initial PREA risk screening consider, when known to the agency: history of prior institutional violence or sexual abuse?	yes
 <b>115.41 (f)</b>	 <b>Screening for risk of victimization and abusiveness</b>	
	Within a set time period not more than 30 days from the inmate's arrival at the facility, does the facility reassess the inmate's risk of victimization or abusiveness based upon any additional, relevant information received by the facility since the intake screening?	yes
 <b>115.41 (g)</b>	 <b>Screening for risk of victimization and abusiveness</b>	
	Does the facility reassess an inmate's risk level when warranted due to a: Referral?	yes
	Does the facility reassess an inmate's risk level when warranted due to a: Request?	yes
	Does the facility reassess an inmate's risk level when warranted due to a: Incident of sexual abuse?	yes
	Does the facility reassess an inmate's risk level when warranted due to a: Receipt of additional information that bears on the inmate's risk of sexual victimization or abusiveness?	yes
 <b>115.41 (h)</b>	 <b>Screening for risk of victimization and abusiveness</b>	
	Is it the case that inmates are not ever disciplined for refusing to answer, or for not disclosing complete information in response to, questions asked pursuant to paragraphs (d)(1), (d)(7), (d)(8), or (d)(9) of this section?	yes

**115.41 (i) Screening for risk of victimization and abusiveness**

Has the agency implemented appropriate controls on the dissemination within the facility of responses to questions asked pursuant to this standard in order to ensure that sensitive information is not exploited to the inmate's detriment by staff or other inmates? yes

**115.42 (a) Use of screening information**

Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Housing Assignments? yes

Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Bed assignments? yes

Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Work Assignments? yes

Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Education Assignments? yes

Does the agency use information from the risk screening required by § 115.41, with the goal of keeping separate those inmates at high risk of being sexually victimized from those at high risk of being sexually abusive, to inform: Program Assignments? yes

**115.42 (b) Use of screening information**

Does the agency make individualized determinations about how to ensure the safety of each inmate? yes

<b>115.42 (c)</b>	<b>Use of screening information</b>	
	When deciding whether to assign a transgender or intersex inmate to a facility for male or female inmates, does the agency consider on a case-by-case basis whether a placement would ensure the inmate's health and safety, and whether a placement would present management or security problems (NOTE: if an agency by policy or practice assigns inmates to a male or female facility on the basis of anatomy alone, that agency is not in compliance with this standard)?	yes
	When making housing or other program assignments for transgender or intersex inmates, does the agency consider on a case-by-case basis whether a placement would ensure the inmate's health and safety, and whether a placement would present management or security problems?	yes
<b>115.42 (d)</b>	<b>Use of screening information</b>	
	Are placement and programming assignments for each transgender or intersex inmate reassessed at least twice each year to review any threats to safety experienced by the inmate?	yes
<b>115.42 (e)</b>	<b>Use of screening information</b>	
	Are each transgender or intersex inmate's own views with respect to his or her own safety given serious consideration when making facility and housing placement decisions and programming assignments?	yes
<b>115.42 (f)</b>	<b>Use of screening information</b>	
	Are transgender and intersex inmates given the opportunity to shower separately from other inmates?	yes

**115.42 (g) Use of screening information**

Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex inmates, does the agency always refrain from placing: lesbian, gay, and bisexual inmates in dedicated facilities, units, or wings solely on the basis of such identification or status? yes

Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex inmates, does the agency always refrain from placing: transgender inmates in dedicated facilities, units, or wings solely on the basis of such identification or status? yes

Unless placement is in a dedicated facility, unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting lesbian, gay, bisexual, transgender, or intersex inmates, does the agency always refrain from placing: intersex inmates in dedicated facilities, units, or wings solely on the basis of such identification or status? yes

**115.43 (a) Protective Custody**

Does the facility always refrain from placing inmates at high risk for sexual victimization in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers? yes

If a facility cannot conduct such an assessment immediately, does the facility hold the inmate in involuntary segregated housing for less than 24 hours while completing the assessment? yes

**115.43 (b) Protective Custody**

Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Programs to the extent possible? yes

Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Privileges to the extent possible? yes

Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Education to the extent possible? yes

Do inmates who are placed in segregated housing because they are at high risk of sexual victimization have access to: Work opportunities to the extent possible? yes

If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document: The opportunities that have been limited? yes

If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document: The duration of the limitation? yes

If the facility restricts access to programs, privileges, education, or work opportunities, does the facility document: The reasons for such limitations? yes

**115.43 (c) Protective Custody**

Does the facility assign inmates at high risk of sexual victimization to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged? yes

Does such an assignment not ordinarily exceed a period of 30 days? yes

**115.43 (d) Protective Custody**

If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, does the facility clearly document: The basis for the facility's concern for the inmate's safety? yes

If an involuntary segregated housing assignment is made pursuant to paragraph (a) of this section, does the facility clearly document: The reason why no alternative means of separation can be arranged? yes

<b>115.43 (e)</b>	<b>Protective Custody</b>	In the case of each inmate who is placed in involuntary segregation because he/she is at high risk of sexual victimization, does the facility afford a review to determine whether there is a continuing need for separation from the general population EVERY 30 DAYS?	yes
<b>115.51 (a)</b>	<b>Inmate reporting</b>	Does the agency provide multiple internal ways for inmates to privately report: Sexual abuse and sexual harassment?	yes
		Does the agency provide multiple internal ways for inmates to privately report: Retaliation by other inmates or staff for reporting sexual abuse and sexual harassment?	yes
		Does the agency provide multiple internal ways for inmates to privately report: Staff neglect or violation of responsibilities that may have contributed to such incidents?	yes
<b>115.51 (b)</b>	<b>Inmate reporting</b>	Does the agency also provide at least one way for inmates to report sexual abuse or sexual harassment to a public or private entity or office that is not part of the agency?	yes
		Is that private entity or office able to receive and immediately forward inmate reports of sexual abuse and sexual harassment to agency officials?	yes
		Does that private entity or office allow the inmate to remain anonymous upon request?	yes
		Are inmates detained solely for civil immigration purposes provided information on how to contact relevant consular officials and relevant officials at the Department of Homeland Security?	yes

<b>115.51 (c)</b>	<b>Inmate reporting</b>	
	Does staff accept reports of sexual abuse and sexual harassment made verbally, in writing, anonymously, and from third parties?	yes
	Does staff promptly document any verbal reports of sexual abuse and sexual harassment?	yes
<b>115.51 (d)</b>	<b>Inmate reporting</b>	
	Does the agency provide a method for staff to privately report sexual abuse and sexual harassment of inmates?	yes
<b>115.52 (a)</b>	<b>Exhaustion of administrative remedies</b>	
	Is the agency exempt from this standard? NOTE: The agency is exempt ONLY if it does not have administrative procedures to address inmate grievances regarding sexual abuse. This does not mean the agency is exempt simply because an inmate does not have to or is not ordinarily expected to submit a grievance to report sexual abuse. This means that as a matter of explicit policy, the agency does not have an administrative remedies process to address sexual abuse.	no
<b>115.52 (b)</b>	<b>Exhaustion of administrative remedies</b>	
	Does the agency permit inmates to submit a grievance regarding an allegation of sexual abuse without any type of time limits? (The agency may apply otherwise-applicable time limits to any portion of a grievance that does not allege an incident of sexual abuse.) (N/A if agency is exempt from this standard.)	yes
	Does the agency always refrain from requiring an inmate to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse? (N/A if agency is exempt from this standard.)	yes

**115.52 (c) Exhaustion of administrative remedies**

Does the agency ensure that: An inmate who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)

yes

Does the agency ensure that: Such grievance is not referred to a staff member who is the subject of the complaint? (N/A if agency is exempt from this standard.)

yes

**115.52 (d) Exhaustion of administrative remedies**

Does the agency issue a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance? (Computation of the 90-day time period does not include time consumed by inmates in preparing any administrative appeal.) (N/A if agency is exempt from this standard.)

yes

If the agency claims the maximum allowable extension of time to respond of up to 70 days per 115.52(d)(3) when the normal time period for response is insufficient to make an appropriate decision, does the agency notify the inmate in writing of any such extension and provide a date by which a decision will be made? (N/A if agency is exempt from this standard.)

yes

At any level of the administrative process, including the final level, if the inmate does not receive a response within the time allotted for reply, including any properly noticed extension, may an inmate consider the absence of a response to be a denial at that level? (N/A if agency is exempt from this standard.)

yes

**115.52 (e) Exhaustion of administrative remedies**

Are third parties, including fellow inmates, staff members, family members, attorneys, and outside advocates, permitted to assist inmates in filing requests for administrative remedies relating to allegations of sexual abuse? (N/A if agency is exempt from this standard.)

yes

Are those third parties also permitted to file such requests on behalf of inmates? (If a third party files such a request on behalf of an inmate, the facility may require as a condition of processing the request that the alleged victim agree to have the request filed on his or her behalf, and may also require the alleged victim to personally pursue any subsequent steps in the administrative remedy process.) (N/A if agency is exempt from this standard.)

yes

If the inmate declines to have the request processed on his or her behalf, does the agency document the inmate's decision? (N/A if agency is exempt from this standard.)

yes

**115.52 (f) Exhaustion of administrative remedies**

Has the agency established procedures for the filing of an emergency grievance alleging that an inmate is subject to a substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)

yes

After receiving an emergency grievance alleging an inmate is subject to a substantial risk of imminent sexual abuse, does the agency immediately forward the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action may be taken? (N/A if agency is exempt from this standard.)

yes

After receiving an emergency grievance described above, does the agency provide an initial response within 48 hours? (N/A if agency is exempt from this standard.)

yes

After receiving an emergency grievance described above, does the agency issue a final agency decision within 5 calendar days? (N/A if agency is exempt from this standard.)

yes

Does the initial response and final agency decision document the agency's determination whether the inmate is in substantial risk of imminent sexual abuse? (N/A if agency is exempt from this standard.)

yes

Does the initial response document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)

yes

Does the agency's final decision document the agency's action(s) taken in response to the emergency grievance? (N/A if agency is exempt from this standard.)

yes

**115.52 (g) Exhaustion of administrative remedies**

If the agency disciplines an inmate for filing a grievance related to alleged sexual abuse, does it do so ONLY where the agency demonstrates that the inmate filed the grievance in bad faith? (N/A if agency is exempt from this standard.)

yes

**115.53 (a) Inmate access to outside confidential support services**

Does the facility provide inmates with access to outside victim advocates for emotional support services related to sexual abuse by giving inmates mailing addresses and telephone numbers, including toll-free hotline numbers where available, of local, State, or national victim advocacy or rape crisis organizations? yes

Does the facility provide persons detained solely for civil immigration purposes mailing addresses and telephone numbers, including toll-free hotline numbers where available of local, State, or national immigrant services agencies? yes

Does the facility enable reasonable communication between inmates and these organizations and agencies, in as confidential a manner as possible? yes

**115.53 (b) Inmate access to outside confidential support services**

Does the facility inform inmates, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws? yes

**115.53 (c) Inmate access to outside confidential support services**

Does the agency maintain or attempt to enter into memoranda of understanding or other agreements with community service providers that are able to provide inmates with confidential emotional support services related to sexual abuse? yes

Does the agency maintain copies of agreements or documentation showing attempts to enter into such agreements? yes

**115.54 (a) Third-party reporting**

Has the agency established a method to receive third-party reports of sexual abuse and sexual harassment? yes

Has the agency distributed publicly information on how to report sexual abuse and sexual harassment on behalf of an inmate? yes

**115.61 (a) Staff and agency reporting duties**

Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency? yes

Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding retaliation against inmates or staff who reported an incident of sexual abuse or sexual harassment? yes

Does the agency require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding any staff neglect or violation of responsibilities that may have contributed to an incident of sexual abuse or sexual harassment or retaliation? yes

**115.61 (b) Staff and agency reporting duties**

Apart from reporting to designated supervisors or officials, does staff always refrain from revealing any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions? yes

**115.61 (c) Staff and agency reporting duties**

Unless otherwise precluded by Federal, State, or local law, are medical and mental health practitioners required to report sexual abuse pursuant to paragraph (a) of this section? yes

Are medical and mental health practitioners required to inform inmates of the practitioner's duty to report, and the limitations of confidentiality, at the initiation of services? yes

**115.61 (d) Staff and agency reporting duties**

If the alleged victim is under the age of 18 or considered a vulnerable adult under a State or local vulnerable persons statute, does the agency report the allegation to the designated State or local services agency under applicable mandatory reporting laws? yes

<b>115.61 (e)</b>	<b>Staff and agency reporting duties</b>	Does the facility report all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to the facility's designated investigators?	yes
<b>115.62 (a)</b>	<b>Agency protection duties</b>	When the agency learns that an inmate is subject to a substantial risk of imminent sexual abuse, does it take immediate action to protect the inmate?	yes
<b>115.63 (a)</b>	<b>Reporting to other confinement facilities</b>	Upon receiving an allegation that an inmate was sexually abused while confined at another facility, does the head of the facility that received the allegation notify the head of the facility or appropriate office of the agency where the alleged abuse occurred?	yes
<b>115.63 (b)</b>	<b>Reporting to other confinement facilities</b>	Is such notification provided as soon as possible, but no later than 72 hours after receiving the allegation?	yes
<b>115.63 (c)</b>	<b>Reporting to other confinement facilities</b>	Does the agency document that it has provided such notification?	yes
<b>115.63 (d)</b>	<b>Reporting to other confinement facilities</b>	Does the facility head or agency office that receives such notification ensure that the allegation is investigated in accordance with these standards?	yes

**115.64 (a) Staff first responder duties**

Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Separate the alleged victim and abuser? yes

Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Preserve and protect any crime scene until appropriate steps can be taken to collect any evidence? yes

Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence? yes

Upon learning of an allegation that an inmate was sexually abused, is the first security staff member to respond to the report required to: Ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating, if the abuse occurred within a time period that still allows for the collection of physical evidence? yes

**115.64 (b) Staff first responder duties**

If the first staff responder is not a security staff member, is the responder required to request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff? yes

**115.65 (a) Coordinated response**

Has the facility developed a written institutional plan to coordinate actions among staff first responders, medical and mental health practitioners, investigators, and facility leadership taken in response to an incident of sexual abuse? yes

**115.66 (a) Preservation of ability to protect inmates from contact with abusers**

Are both the agency and any other governmental entities responsible for collective bargaining on the agency's behalf prohibited from entering into or renewing any collective bargaining agreement or other agreement that limit the agency's ability to remove alleged staff sexual abusers from contact with any inmates pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted?      yes

**115.67 (a) Agency protection against retaliation**

Has the agency established a policy to protect all inmates and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other inmates or staff?      yes

Has the agency designated which staff members or departments are charged with monitoring retaliation?      yes

**115.67 (b) Agency protection against retaliation**

Does the agency employ multiple protection measures, such as housing changes or transfers for inmate victims or abusers, removal of alleged staff or inmate abusers from contact with victims, and emotional support services for inmates or staff who fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations?      yes

**115.67 (c) Agency protection against retaliation**

Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates or staff who reported the sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff? yes

Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor the conduct and treatment of inmates who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by inmates or staff? yes

Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Act promptly to remedy any such retaliation? yes

Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor any inmate disciplinary reports? yes

Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate housing changes? yes

Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor inmate program changes? yes

Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor negative performance reviews of staff? yes

Except in instances where the agency determines that a report of sexual abuse is unfounded, for at least 90 days following a report of sexual abuse, does the agency: Monitor reassignments of staff? yes

Does the agency continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need? yes

**115.67 (d) Agency protection against retaliation**

In the case of inmates, does such monitoring also include periodic status checks? yes

<b>115.67 (e)</b>	<b>Agency protection against retaliation</b>	If any other individual who cooperates with an investigation expresses a fear of retaliation, does the agency take appropriate measures to protect that individual against retaliation?	yes
<b>115.68 (a)</b>	<b>Post-allegation protective custody</b>	Is any and all use of segregated housing to protect an inmate who is alleged to have suffered sexual abuse subject to the requirements of § 115.43?	yes
<b>115.71 (a)</b>	<b>Criminal and administrative agency investigations</b>	When the agency conducts its own investigations into allegations of sexual abuse and sexual harassment, does it do so promptly, thoroughly, and objectively? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).)	yes
		Does the agency conduct such investigations for all allegations, including third party and anonymous reports? (N/A if the agency/facility is not responsible for conducting any form of criminal OR administrative sexual abuse investigations. See 115.21(a).)	yes
<b>115.71 (b)</b>	<b>Criminal and administrative agency investigations</b>	Where sexual abuse is alleged, does the agency use investigators who have received specialized training in sexual abuse investigations as required by 115.34?	yes
<b>115.71 (c)</b>	<b>Criminal and administrative agency investigations</b>	Do investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data?	yes
		Do investigators interview alleged victims, suspected perpetrators, and witnesses?	yes
		Do investigators review prior reports and complaints of sexual abuse involving the suspected perpetrator?	yes

- 115.71 (d) Criminal and administrative agency investigations**
- When the quality of evidence appears to support criminal prosecution, does the agency conduct compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution? yes
- 115.71 (e) Criminal and administrative agency investigations**
- Do agency investigators assess the credibility of an alleged victim, suspect, or witness on an individual basis and not on the basis of that individual's status as inmate or staff? yes
- Does the agency investigate allegations of sexual abuse without requiring an inmate who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding? yes
- 115.71 (f) Criminal and administrative agency investigations**
- Do administrative investigations include an effort to determine whether staff actions or failures to act contributed to the abuse? yes
- Are administrative investigations documented in written reports that include a description of the physical evidence and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings? yes
- 115.71 (g) Criminal and administrative agency investigations**
- Are criminal investigations documented in a written report that contains a thorough description of the physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible? yes
- 115.71 (h) Criminal and administrative agency investigations**
- Are all substantiated allegations of conduct that appears to be criminal referred for prosecution? yes

- 115.71 (i) Criminal and administrative agency investigations**
- Does the agency retain all written reports referenced in 115.71(f) and (g) for as long as the alleged abuser is incarcerated or employed by the agency, plus five years? yes
- 115.71 (j) Criminal and administrative agency investigations**
- Does the agency ensure that the departure of an alleged abuser or victim from the employment or control of the agency does not provide a basis for terminating an investigation? yes
- 115.71 (l) Criminal and administrative agency investigations**
- When an outside entity investigates sexual abuse, does the facility cooperate with outside investigators and endeavor to remain informed about the progress of the investigation? (N/A if an outside agency does not conduct administrative or criminal sexual abuse investigations. See 115.21(a).) na
- 115.72 (a) Evidentiary standard for administrative investigations**
- Is it true that the agency does not impose a standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated? yes
- 115.73 (a) Reporting to inmates**
- Following an investigation into an inmate's allegation that he or she suffered sexual abuse in an agency facility, does the agency inform the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded? yes
- 115.73 (b) Reporting to inmates**
- If the agency did not conduct the investigation into an inmate's allegation of sexual abuse in an agency facility, does the agency request the relevant information from the investigative agency in order to inform the inmate? (N/A if the agency/facility is responsible for conducting administrative and criminal investigations.) na

**115.73 (c) Reporting to inmates**

Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the inmate has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer posted within the inmate's unit? yes

Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The staff member is no longer employed at the facility? yes

Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been indicted on a charge related to sexual abuse in the facility? yes

Following an inmate's allegation that a staff member has committed sexual abuse against the resident, unless the agency has determined that the allegation is unfounded, or unless the resident has been released from custody, does the agency subsequently inform the resident whenever: The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility? yes

**115.73 (d) Reporting to inmates**

Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility? yes

Following an inmate's allegation that he or she has been sexually abused by another inmate, does the agency subsequently inform the alleged victim whenever: The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility? yes

<b>115.73 (e)</b>	<b>Reporting to inmates</b>	Does the agency document all such notifications or attempted notifications?	yes
<b>115.76 (a)</b>	<b>Disciplinary sanctions for staff</b>	Are staff subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies?	yes
<b>115.76 (b)</b>	<b>Disciplinary sanctions for staff</b>	Is termination the presumptive disciplinary sanction for staff who have engaged in sexual abuse?	yes
<b>115.76 (c)</b>	<b>Disciplinary sanctions for staff</b>	Are disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories?	yes
<b>115.76 (d)</b>	<b>Disciplinary sanctions for staff</b>	Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Law enforcement agencies(unless the activity was clearly not criminal)?	yes
		Are all terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, reported to: Relevant licensing bodies?	yes

<b>115.77 (a)</b>	<b>Corrective action for contractors and volunteers</b>	
	Is any contractor or volunteer who engages in sexual abuse prohibited from contact with inmates?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Law enforcement agencies (unless the activity was clearly not criminal)?	yes
	Is any contractor or volunteer who engages in sexual abuse reported to: Relevant licensing bodies?	yes
 <b>115.77 (b)</b>	 <b>Corrective action for contractors and volunteers</b>	
	In the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer, does the facility take appropriate remedial measures, and consider whether to prohibit further contact with inmates?	yes
 <b>115.78 (a)</b>	 <b>Disciplinary sanctions for inmates</b>	
	Following an administrative finding that an inmate engaged in inmate-on-inmate sexual abuse, or following a criminal finding of guilt for inmate-on-inmate sexual abuse, are inmates subject to disciplinary sanctions pursuant to a formal disciplinary process?	yes
 <b>115.78 (b)</b>	 <b>Disciplinary sanctions for inmates</b>	
	Are sanctions commensurate with the nature and circumstances of the abuse committed, the inmate's disciplinary history, and the sanctions imposed for comparable offenses by other inmates with similar histories?	yes
 <b>115.78 (c)</b>	 <b>Disciplinary sanctions for inmates</b>	
	When determining what types of sanction, if any, should be imposed, does the disciplinary process consider whether an inmate's mental disabilities or mental illness contributed to his or her behavior?	yes

- 115.78 (d) Disciplinary sanctions for inmates**
- If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, does the facility consider whether to require the offending inmate to participate in such interventions as a condition of access to programming and other benefits? yes
- 115.78 (e) Disciplinary sanctions for inmates**
- Does the agency discipline an inmate for sexual contact with staff only upon a finding that the staff member did not consent to such contact? yes
- 115.78 (f) Disciplinary sanctions for inmates**
- For the purpose of disciplinary action does a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred NOT constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation? yes
- 115.78 (g) Disciplinary sanctions for inmates**
- Does the agency always refrain from considering non-coercive sexual activity between inmates to be sexual abuse? (N/A if the agency does not prohibit all sexual activity between inmates.) yes
- 115.81 (a) Medical and mental health screenings; history of sexual abuse**
- If the screening pursuant to § 115.41 indicates that a prison inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening? yes

**115.81 (b) Medical and mental health screenings; history of sexual abuse**

If the screening pursuant to § 115.41 indicates that a prison inmate has previously perpetrated sexual abuse, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening? (N/A if the facility is not a prison.)

yes

**115.81 (c) Medical and mental health screenings; history of sexual abuse**

If the screening pursuant to § 115.41 indicates that a jail inmate has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, do staff ensure that the inmate is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening?

yes

**115.81 (d) Medical and mental health screenings; history of sexual abuse**

Is any information related to sexual victimization or abusiveness that occurred in an institutional setting strictly limited to medical and mental health practitioners and other staff as necessary to inform treatment plans and security management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law?

yes

**115.81 (e) Medical and mental health screenings; history of sexual abuse**

Do medical and mental health practitioners obtain informed consent from inmates before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the inmate is under the age of 18?

yes

**115.82 (a) Access to emergency medical and mental health services**

Do inmate victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined by medical and mental health practitioners according to their professional judgment?

yes

**115.82 (b) Access to emergency medical and mental health services**

If no qualified medical or mental health practitioners are on duty at the time a report of recent sexual abuse is made, do security staff first responders take preliminary steps to protect the victim pursuant to § 115.62? yes

Do security staff first responders immediately notify the appropriate medical and mental health practitioners? yes

**115.82 (c) Access to emergency medical and mental health services**

Are inmate victims of sexual abuse offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate? yes

**115.82 (d) Access to emergency medical and mental health services**

Are treatment services provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident? yes

**115.83 (a) Ongoing medical and mental health care for sexual abuse victims and abusers**

Does the facility offer medical and mental health evaluation and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility? yes

**115.83 (b) Ongoing medical and mental health care for sexual abuse victims and abusers**

Does the evaluation and treatment of such victims include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody? yes



**115.83 (h) Ongoing medical and mental health care for sexual abuse victims and abusers**

If the facility is a prison, does it attempt to conduct a mental health evaluation of all known inmate-on-inmate abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners? (NA if the facility is a jail.)

yes

**115.86 (a) Sexual abuse incident reviews**

Does the facility conduct a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded?

yes

**115.86 (b) Sexual abuse incident reviews**

Does such review ordinarily occur within 30 days of the conclusion of the investigation?

yes

**115.86 (c) Sexual abuse incident reviews**

Does the review team include upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners?

yes

<b>115.86 (d)</b>	<b>Sexual abuse incident reviews</b>	
	Does the review team: Consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse?	yes
	Does the review team: Consider whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; gang affiliation; or other group dynamics at the facility?	yes
	Does the review team: Examine the area in the facility where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse?	yes
	Does the review team: Assess the adequacy of staffing levels in that area during different shifts?	yes
	Does the review team: Assess whether monitoring technology should be deployed or augmented to supplement supervision by staff?	yes
	Does the review team: Prepare a report of its findings, including but not necessarily limited to determinations made pursuant to §§ 115.86(d)(1)-(d)(5), and any recommendations for improvement and submit such report to the facility head and PREA compliance manager?	yes
 <b>115.86 (e)</b>	 <b>Sexual abuse incident reviews</b>	
	Does the facility implement the recommendations for improvement, or document its reasons for not doing so?	yes
 <b>115.87 (a)</b>	 <b>Data collection</b>	
	Does the agency collect accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions?	yes
 <b>115.87 (b)</b>	 <b>Data collection</b>	
	Does the agency aggregate the incident-based sexual abuse data at least annually?	yes

<b>115.87 (c)</b>	<b>Data collection</b>	Does the incident-based data include, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence conducted by the Department of Justice?	yes
<b>115.87 (d)</b>	<b>Data collection</b>	Does the agency maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews?	yes
<b>115.87 (e)</b>	<b>Data collection</b>	Does the agency also obtain incident-based and aggregated data from every private facility with which it contracts for the confinement of its inmates? (N/A if agency does not contract for the confinement of its inmates.)	yes
<b>115.87 (f)</b>	<b>Data collection</b>	Does the agency, upon request, provide all such data from the previous calendar year to the Department of Justice no later than June 30? (N/A if DOJ has not requested agency data.)	yes
<b>115.88 (a)</b>	<b>Data review for corrective action</b>	Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Identifying problem areas?	yes
		Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Taking corrective action on an ongoing basis?	yes
		Does the agency review data collected and aggregated pursuant to § 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including by: Preparing an annual report of its findings and corrective actions for each facility, as well as the agency as a whole?	yes

<b>115.88 (b)</b>	<b>Data review for corrective action</b>	Does the agency's annual report include a comparison of the current year's data and corrective actions with those from prior years and provide an assessment of the agency's progress in addressing sexual abuse?	yes
<b>115.88 (c)</b>	<b>Data review for corrective action</b>	Is the agency's annual report approved by the agency head and made readily available to the public through its website or, if it does not have one, through other means?	yes
<b>115.88 (d)</b>	<b>Data review for corrective action</b>	Does the agency indicate the nature of the material redacted where it redacts specific material from the reports when publication would present a clear and specific threat to the safety and security of a facility?	yes
<b>115.89 (a)</b>	<b>Data storage, publication, and destruction</b>	Does the agency ensure that data collected pursuant to § 115.87 are securely retained?	yes
<b>115.89 (b)</b>	<b>Data storage, publication, and destruction</b>	Does the agency make all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website or, if it does not have one, through other means?	yes
<b>115.89 (c)</b>	<b>Data storage, publication, and destruction</b>	Does the agency remove all personal identifiers before making aggregated sexual abuse data publicly available?	yes

**115.89 (d) Data storage, publication, and destruction**

Does the agency maintain sexual abuse data collected pursuant to § 115.87 for at least 10 years after the date of the initial collection, unless Federal, State, or local law requires otherwise? yes

**115.401 (a) Frequency and scope of audits**

During the prior three-year audit period, did the agency ensure that each facility operated by the agency, or by a private organization on behalf of the agency, was audited at least once? (Note: The response here is purely informational. A "no" response does not impact overall compliance with this standard.) yes

**115.401 (b) Frequency and scope of audits**

During each one-year period starting on August 20, 2013, did the agency ensure that at least one-third of each facility type operated by the agency, or by a private organization on behalf of the agency, was audited? yes

**115.401 (h) Frequency and scope of audits**

Did the auditor have access to, and the ability to observe, all areas of the audited facility? yes

**115.401 (i) Frequency and scope of audits**

Was the auditor permitted to request and receive copies of any relevant documents (including electronically stored information)? yes

**115.401 (m) Frequency and scope of audits**

Was the auditor permitted to conduct private interviews with inmates, residents, and detainees? yes

**115.401 (n) Frequency and scope of audits**

Were inmates permitted to send confidential information or correspondence to the auditor in the same manner as if they were communicating with legal counsel? yes

**115.403 (f) Audit contents and findings**

The agency has published on its agency website, if it has one, or has otherwise made publicly available, all Final Audit Reports within 90 days of issuance by auditor. The review period is for prior audits completed during the past three years PRECEDING THIS AGENCY AUDIT. In the case of single facility agencies, the auditor shall ensure that the facility's last audit report was published. The pendency of any agency appeal pursuant to 28 C.F.R. § 115.405 does not excuse noncompliance with this provision. (N/A if there have been no Final Audit Reports issued in the past three years, or in the case of single facility agencies that there has never been a Final Audit Report issued.) yes